

B E T W E E N:

- 1. WOLVERHAMPTON CITY COUNCIL**
- 2. DUDLEY METROPOLITAN BOROUGH COUNCIL**
- 3. SANDWELL METROPOLITAN BOROUGH COUNCIL**
- 4. WALSALL METROPOLITAN BOROUGH COUNCIL**

Claimants

-and-

1. PERSONS UNKNOWN WHO PARTICIPATE BETWEEN THE HOURS OF 3:00PM AND 7:00AM IN A GATHERING OF 2 OR MORE PERSONS WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED) AT WHICH SOME OF THOSE PRESENT ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING

2 PERSONS UNKNOWN WHO PARTICIPATE BETWEEN THE HOURS OF 3:00PM AND 7:00AM IN A GATHERING OF 2 OR MORE PERSONS WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED) WITH THE INTENTION OR EXPECTATION THAT SOME OF THOSE PRESENT WILL ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING

3. PERSONS UNKNOWN PROMOTING ORGANISING PUBLICISING (BY ANY MEANS WHATSOEVER) ANY GATHERING BETWEEN THE HOURS OF 3:00PM AND 7:00AM OF 2 OR MORE PERSONS WITH THE INTENTION OR EXPECTATION THAT SOME OF THOSE PRESENT WILL ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED)

4. PERSONS UNKNOWN BEING DRIVERS, RIDERS OR PASSENGERS IN OR ON MOTOR VEHICLE(S) WHO PARTICIPATE BETWEEN THE HOURS OF 3:00PM AND 7:00AM IN A GATHERING OF 2 OR MORE PERSONS WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED) AT WHICH SUCH DEFENDANTS ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING

5. Mr ANTHONY PAUL GALE

6. Miss WIKTORIA SZCUBLINSKA

7. Mr ISA IQBAL

8. Mr MASON PHELPS

Defendants

**CLAIMANTS' APPLICATION FOR INJUNCTIVE RELIEF
BUNDLE OF DOCUMENTS FOR USE AT A HEARING LISTED 27 FEBRUARY AND
28 FEBRUARY 2024**

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A. SECTION A - STATEMENTS OF CASE



Claim Form (CPR Part 8)

In the High Court of Justice, King's Bench Division Birmingham District Registry	
Claim no.	
Fee Account no.	PBA0082797
Help with Fees - Ref no. (if applicable)	H W F - <input type="text"/> <input type="text"/> - <input type="text"/> <input type="text"/>

Claimant

- (1) WOLVERHAMPTON CITY COUNCIL
- (2) DUDLEY METROPOLITAN BOROUGH COUNCIL
- (3) SANDWELL METROPOLITAN BOROUGH COUNCIL
- (4) WALSALL METROPOLITAN BOROUGH COUNCIL



C/O WOLVERHAMPTON CITY COUNCIL, LEGAL SERVICES, CIVIC CENTRE,
ST PETER'S SQUARE, WOLVERHAMPTON, WV1 1RG

Defendant(s)

PERSONS UNKNOWN
(AS DESCRIBED IN THE ATTACHED PARTICULARS OF CLAIM)

Does your claim include any issues under the Human Rights Act 1998? Yes No

Details of claim (see also overleaf)

The Claimants respectfully invite the honourable court to grant injunctive relief (reinforced with a power off arrest pursuant to the Court's powers under section 37(1) of the Senior Courts Act 1981 to restrain street racing and associated dangerous driving activities in the Black Country area (which the Claimants define, for the purposes of this injunction as the entirety of the combined local government areas of Dudley, Sandwell, Walsall and Wolverhampton Councils).

Should the honourable Court be minded to grant the injunctive relief sought by the Claimants, the Claimants further invite the Court to exercise the discretion granted to it pursuant to rule 81.8 of the Civil Procedure Rules and dispense with the requirement to serve any injunction and power of arrest on persons unknown personally and instead serve any injunction and power of arrest granted by alternative means.

Full details of the claim together with draft orders and further details of the requisite steps the Claimants suggest would achieve effective alternative service of the order, should the honouable court grant any injunction and power of arrest, on persons unknown as particularised in the attached documentation and also be minded to permit the Claimants to serve any order by alternative means to personal service.

(Continued overleaf ...)

Defendant's name and address

PERSONS UNKNOWN
(AS DESCRIBED IN THE ATTACHED PARTICULARS OF CLAIM)

	£
Court fee	569.00
Legal representative's costs	
Issue date	

For further details of the courts www.gov.uk/find-court-tribunal.

When corresponding with the Court, please address forms or letters to the Manager and always quote the claim number.

Claim no.	
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Details of claim (continued)

The Claimants would respectfully draw attention to the attached particulars of claim for full details of this claim.

"BLACK COUNTRY CAR CRUISE"
WOLVERHAMPTON CITY COUNCIL
DX744350 WOLVERHAMPTON 27
REF: LIT/AS/LIJ017753P
E-mail: litigation@wolverhampton.gov.uk

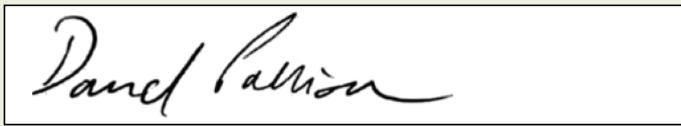
Claimant's or claimant's legal representative's address to which documents should be sent if different from overleaf. If you are prepared to accept service by DX, fax or e-mail, please add details.

Statement of Truth

I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

- I believe that the facts stated in these particulars of claim are true.
- The Claimant believes** that the facts stated in these particulars of claim are true. **I am authorised** by the claimant to sign this statement.

Signature



- Claimant
- Litigation friend (where claimant is a child or a Protected Party)
- Claimant's legal representative (as defined by CPR 2.3(1))

Date

Day	Month	Year
<input type="text" value="07"/>	<input type="text" value="10"/>	<input type="text" value="2022"/>

Full name

Name of claimant's legal representative's firm

If signing on behalf of firm or company give position or office held

Find out how HM Courts and Tribunals Service uses personal information you give them when you fill in a form: <https://www.gov.uk/government/organisations/hm-courts-and-tribunals-service/about/personal-information-charter>

Claim No.

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION
BIRMINGHAM DISTRICT REGISTRY

B E T W E E N:-

1. WOLVERHAMPTON CITY COUNCIL
2. DUDLEY METROPOLITAN BOROUGH
COUNCIL
3. SANDWELL METROPOLITAN BOROUGH
COUNCIL
4. WALSALL METROPOLITAN BOROUGH
COUNCIL

Claimants

-and-

PERSONS UNKNOWN

Defendant

PARTICULARS OF CLAIM

Wolverhampton City Council,
Legal Services,
Civic Centre,
St Peter's Square,
Wolverhampton

Ref: LIJ017753P/01201576

Solicitor for the Claimants

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION
BIRMINGHAM DISTRICT REGISTRY

Claim No.

In the matter of an application for an injunction under s.222 Local
Government Act 1972 and s.130 of the Highways Act 1980

B E T W E E N:-

1. WOLVERHAMPTON CITY COUNCIL
2. DUDLEY METROPOLITAN BOROUGH COUNCIL
3. SANDWELL METROPOLITAN BOROUGH COUNCIL
4. WALSALL METROPOLITAN
BOROUGH COUNCIL

Claimants

-and-

1. PERSONS UNKNOWN WHO PARTICIPATE BETWEEN THE HOURS OF
3:00PM AND 7:00AM IN A GATHERING OF 2 OR MORE PERSONS WITHIN
THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED) AT
WHICH SOME OF THOSE PRESENT ENGAGE IN MOTOR RACING OR
MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING

2 PERSONS UNKNOWN WHO PARTICIPATE BETWEEN THE HOURS OF
3:00PM AND 7:00AM IN A GATHERING OF 2 OR MORE PERSONS WITHIN
THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED) WITH THE
INTENTION OR EXPECTATION THAT SOME OF THOSE PRESENT WILL
ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER
DANGEROUS OR OBSTRUCTIVE DRIVING

3. PERSONS UNKNOWN PROMOTING ORGANISING PUBLICISING (BY ANY
MEANS WHATSOEVER) ANY GATHERING BETWEEN THE HOURS OF
3:00PM AND 7:00AM OF 2 OR MORE PERSONS WITH THE INTENTION OR
EXPECTATION THAT SOME OF THOSE PRESENT WILL ENGAGE IN MOTOR
RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE
DRIVING

WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED)

Defendants

PARTICULARS OF CLAIM

Introduction

- 1 Part 8 of the Civil Procedure Rules 1998 applies to this claim.

- 2 In these Particulars of Claim the following definitions have been applied:
 - (1) "The Black Country" the combined local authority areas of all the Claimants. The Claimants areas are shown on the plan annexed hereto (Plan A).

 - (2) "Car Cruising" organised or impromptu events at which drivers of cars race, perform driving stunts, drive dangerously and drive in convoy. Such activities may be noisy, dangerous and illegal, obstructing highways and the premises bordering them, damaging property and putting the safety of spectators and other persons at risk.

 - (3) The "Original Injunction" Injunction granted by HHJ Owen QC on 1 December 2014 and renewed by HHJ McKenna on 9 January 2018 in *Wolverhampton & Others v Persons Unknown* [2014] (Claim No A90BM228) which was in effect from 2 February 2015

- (4) "Stunts" Driving manoeuvres often undertaken as part of car cruising including:
- (a) "Burnouts" Causing a vehicle to destroy its tyres by applying power to the drive wheels while braking so as to remain in place while the wheels revolve at speed.
 - (b) "Donuts/Donutting" Causing a vehicle to rotate around a fixed point (normally the front axle) while not moving-off causing noise, smoke and tyre marks to be created.
 - (c) "Drifting" Turning by placing the vehicle in a skid so that most sideways motion is due to the skid not any significant steering input.
 - (d) "Undertaking" passing a vehicle on its nearside so as to overtake in circumstances not permitted by the Highway Code.

3 The Claimants are local authorities with the meaning of the Local Government Act 1972.

4 The West Midland Police Force ('the Police') serve the areas of all the Claimants.

5 Since, at least, 2012 the Claimants have, in co-operation with the Police, have been attempting to eliminate car cruising in their areas.

6 By this claim the Claimants seek an injunction restraining car cruising across the whole of the Black Country.

Background

7 The Claimants obtained the Original Injunction which was in effect from 2 February 2015 until 1 February 2021.

8 The Claimants aver that the Original Injunction caused or contributed to a substantial reduction in car cruising in the Black Country and the committal proceedings brought for breach of the Original Injunction served as a deterrent to persons contemplating car cruising.

9 The Original Injunction did not eliminate car cruising but did cause a decrease in such activity. Since the order lapsed there has been a marked increase.

Relevant Enactments

10 Section 37(1) Senior Courts Act 1981 provides that:

“The High Court may by order (whether interlocutory or final) grant an injunction or appoint a receiver in all cases in which it appears to the court to be just and convenient to do so.”

11 For the reasons set out in the evidence filed herewith (and the evidence in support of the application for the Original Injunction) the Claimants will contend it is just and convenient for the honourable court to grant an injunction in this instance.

12 Section 111(1) Local Government Act 1972 provides that:

“Without prejudice to any powers exercisable apart from this section but subject to the provisions of this Act and any other enactment passed before or after this Act, a local authority shall have power to do anything (whether or not involving the expenditure, borrowing or lending of money or the acquisition or disposal of any property or rights) which is calculated to facilitate, or is conducive or incidental to, the discharge of any of their functions.”

13 Section 222 Local Government Act 1972 extends that power and empowers local authorities to become involved in litigation if so doing facilitates the discharge of their functions and is in the interest of their inhabitants.

14 Section 222(1) Local Government Act 1972 provides that:

(1) “Where a local authority consider it expedient for the promotion or protection of the interests of the inhabitants of their area—

- (a) they may prosecute or defend or appear in any legal proceedings and, in the case of civil proceedings, may institute them in their own name, and
- (b) they may, in their own name, make representations in the interests of the inhabitants at any public inquiry held by or on behalf of any Minister or public body under any enactment."

15 Further, section 1 of the Localism Act 2011 provides that a local authority has power to do anything that individuals may do.

16 Accordingly, the Claimants are entitled to bring this claim for the benefit of all inhabitants of the Black Country. Further it is just and convenient and in accordance with the overriding objective for all the Claimants to bring a single claim.

17 By section 130, Highways Act 1980, the Claimants are under a duty to assert and protect the rights of the public to the use and enjoyment of any highway for which they are the highway authority. The injunctive relief sought in these proceedings is necessary to protect the rights of the public to the use and enjoyment of highways within the Claimants' districts.

18 By section 6 of the Crime and Disorder Act 1998, local authorities must formulate and implement, *inter alia*, a strategy for the reduction of crime and disorder in their areas (including anti-social and other behaviour adversely affecting the local environment), which strategy the authorities must keep under review for the purposes of monitoring its effectiveness and making any necessary or expedient changes.

19 Section 17(1) Crime and Disorder Act 1998 provides that:

“Without prejudice to any other obligation imposed on it, it shall be the duty of each authority to which this section applies to exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can to prevent, crime and disorder in its area.”

20 The Claimants contend that taking measures to combat car cruising falls within and forms part of their statutory function (set out above) to reduce crime and disorder in their areas.

Factual Background

- 21 The Claimants will rely upon the witness statements filed with this Claim Form and those filed in support of the adjourned application to extend the Original Injunction.
- 22 In summary the Claimants aver that:
- (1) Persons participating in car cruising meet on highways and areas adjacent to highways. Such areas include industrial estates and carparks.
 - (2) The locations for such meetings vary but are to be found throughout the Black Country.
 - (3) Such meetings may be publicised in advance via social media or word of mouth or may be impromptu.
 - (4) At such meetings some or all of conduct set out above takes place.
 - (5) Such conduct affects the safety, comfort, well-being and livelihoods of inhabitants of the Black Country.
 - (6) Such conduct diverts the resources of the Police, Ambulance Service and hospitals away from other legitimate matters.
- 23 The Original Injunction was effective in reducing and inhibiting car cruising.

- 24 Since 2 February 2021 car cruising has again increased with more events and larger numbers of spectators at such events. The Police are receiving an increased volume of calls relating to such activities.
- 25 Such increased activity has continued following the relaxation of restrictions on social gatherings imposed during the covid-19 pandemic. There appears to be a growing perception among those who engage in car cruising that the Claimants and the Police are impotent to restrict the activity.

Justification for an Injunction

- 26 An Injunction in the terms sought would assist the Claimants in discharging their statutory duties set out above.
- 27 Such an Injunction would be of benefit to persons generally throughout the Black Country.
- 28 The proposed Injunction does not interfere with rights and freedoms of the Defendants since the behaviour that it seeks to prohibit is illegal and/or anti-social. The Defendants remain free to attend lawful motorsports events and exhibitions.

Power of Arrest

29 Section 27 of the Police and Justice Act 2006 provides *inter alia*:

“(1) This section applies to proceedings in which a local authority is a party by virtue of section 222 of the Local Government Act 1972 (c 70) (power of local authority to bring, defend or appear in proceedings for the promotion or protection of the interests of inhabitants of their area).

(2) If the court grants an injunction which prohibits conduct which is capable of causing nuisance or annoyance to a person it may, if subsection (3) applies, attach a power of arrest to any provision of the injunction.

(3) This subsection applies if the local authority applies to the court to attach the power of arrest and the court thinks that either—

(a) the conduct mentioned in subsection (2) consists of or includes the use or threatened use of violence, or

(b) there is a significant risk of harm to the person mentioned in that subsection...”

30 The Claimants aver that car cruising causes and is capable of causing nuisance or annoyance to persons in the Black Country and that the car cruising creates a significant risk of harm to such persons.

Service of this Claim Form

31 The Claimants seek orders for service of the Claim Form and supporting documentation by alternative means pursuant to CPR 6.15 & 6.27. The proposed steps to effect service are set out in a draft Order. Such steps are likely to bring this Claim and the hearing of the application for an Injunction to the attention of those persons who may wish to oppose the making of the order or intervene in the proceedings.

Service of any Injunction Granted

32 The Claimants will also seek an order dispensing with personal service of the Injunction. The proposed steps to bring the order to the attention of persons likely to be affected by any Injunction are set out in a draft order.

33 The Claimants submit that such steps are likely to ensure that awareness of the existence of the Injunction will be widespread throughout the Black Country.

And the Claimants claim:

- (1) An Injunction Order in the form annexed hereto;
- (2) A Power of Arrest ancillary to such Injunction;

(3) Such further or other relief as the Court thinks fit.

MICHAEL SINGLETON

DATED this 07 day of OCTOBER 2022

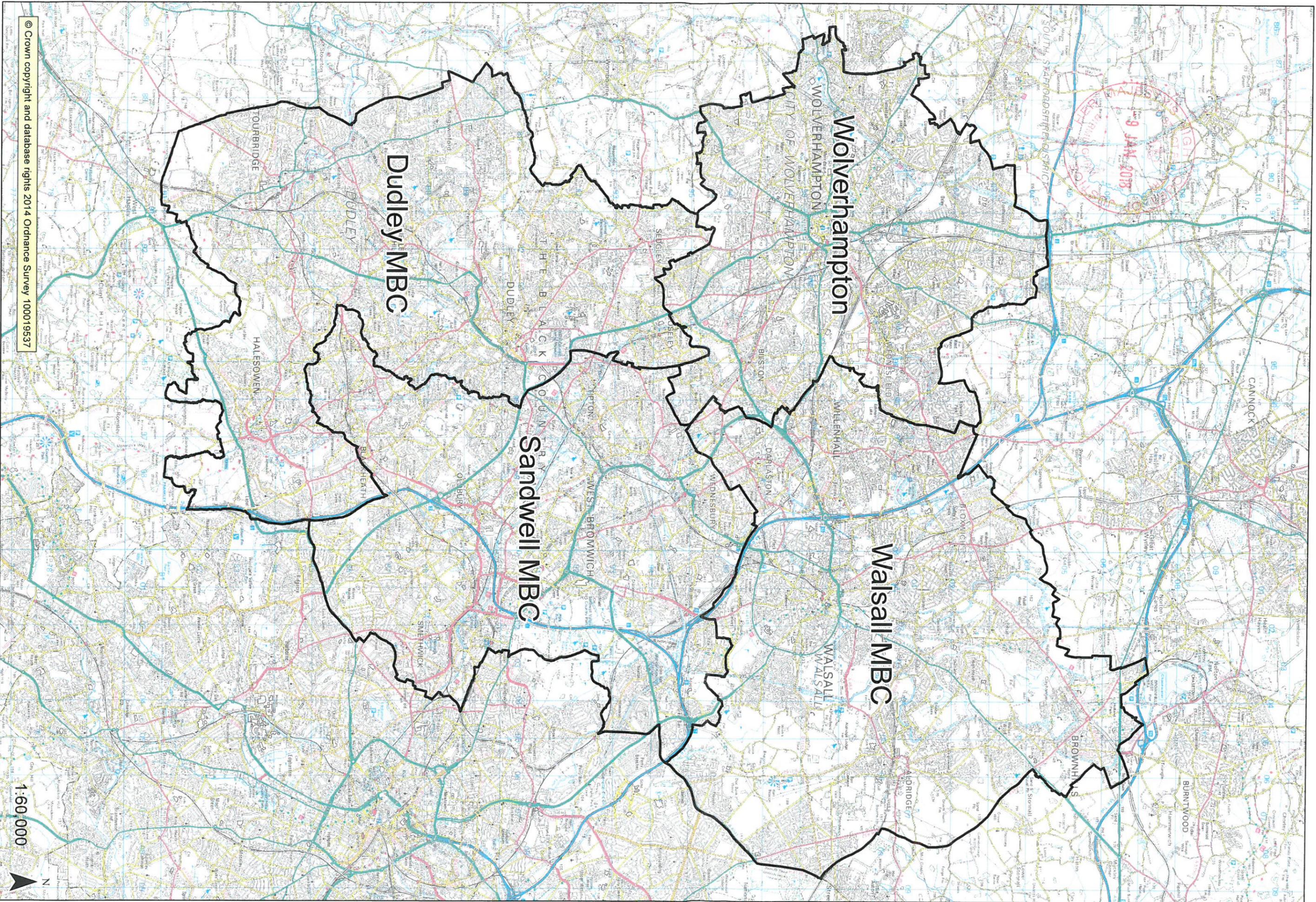
The Claimants believe that the facts stated in these Particulars of Claim are true. I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

I am duly authorised by all the Claimants to sign this statement.

FULL NAME: DAVID PATTISON

POSITION OR OFFICE HELD: CHIEF OPERATING OFFICER

SIGNED: 



Application for Injunction (General Form)

Name of court High Court of Justice	Claim No.
Claimant's Name and Ref. WOLVERHAMPTON CITY COUNCIL (ref: LIT/AS/LIJ017753P)	
Defendant's Name and Ref. PERSONS UNKNOWN	
Fee Account no. PBA0082797	

Notes on completion

Tick which boxes apply and specify the legislation where appropriate

(1) Enter the full name of the person making the application

(2) Enter the full name of the person the injunction is to be directed to

(3) Set out any proposed orders requiring acts to be done. Delete if no mandatory order is sought.

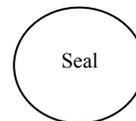
(4) Set out here the proposed terms of the injunction order (if the defendant is a limited company delete the wording in brackets and insert 'whether by its servants, agents, officers or otherwise').

(5) Set out here any further terms asked for including provision for costs

By application in pending proceedings

Under Statutory provision s.37(1) Senior Courts Act 1981

This application is made under Part 8 of the Civil Procedure Rules



This application raises issues under the Human Rights Act 1998

Yes

No

The Claimant ⁽¹⁾ WOLVERHAMPTON CITY COUNCIL applies to the court for an injunction order in the following terms:

- 1. The Defendants be forbidden (whether by themselves or by instructing or encouraging or permitting any other person) ⁽⁴⁾**

To participate between the hours of 3:00 p.m. and 7:00 a.m. in a gathering of 2 or more persons within the Black Country Area shown on Plan A (attached) at which some of those present engage in motor racing or motor stunts or other dangerous or obstructive driving.

- 2. To participate between the hours of 3:00 p.m. and 7:00 a.m. in a gathering of 2 or more persons within the Black Country Area shown on Plan A (attached) with the intention or expectation that some of those present will engage in motor racing or motor stunts or other dangerous or obstructive driving.**

- 3. To promote, organise or publicise (by any means whatsoever) any gathering between the hours of 3:00 p.m. and 7:00 a.m. of 2 or more persons with the intention or expectation that some of those present will engage in motor racing or motor stunts or other dangerous or obstructive driving within the Black Country Area shown on Plan A (attached).**

The court office at The High Court of Justice, Birmingham District Registry, 5th Floor, Priory Courts, 33 Bull Street, Birmingham, B4 6DS (telephone: 0121 681 4441) is open between 10 a.m. to 4 p.m. Mondays to Fridays (excluding public holidays.) When contacting the court please mark any correspondence for the attention of the Court Manager and always quote the Claim number.

N16A General form of application for injunction (05.14)

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Stunts are driving manoeuvres often undertaken at such gatherings including but not limited to:

- a. "Burnouts" – Causing a vehicle to destroy its tyres by applying power to the drive wheels while braking so as to remain in place while the wheels revolve at speed.
- b. "Donuts/Donutting" – Causing a vehicle to rotate around a fixed point (normally the front axle) while not moving-off causing noise, smoke and tyre marks to be created.
- c. "Drifting" – Turning by placing the vehicle in a skid so that most sideways motion is due to the skid not any significant steering input.
- d. "Undertaking" – Passing a vehicle on its nearside so as to overtake in circumstances not permitted by the Highway Code

(6)Enter the names of all persons who have sworn affidavits or signed statements in support of this application

And that ⁽⁵⁾ **a power of arrest applies to clauses 1 and 2 of the injunction set out above.**

(7)Enter the names and addresses of all persons upon whom it is intended to serve this application

The grounds of this application are set out in the written evidence of ⁽⁶⁾ Please see appended index of evidence to the bundle of documents filed in support of this application.

This written evidence is served with this application.

This application is to be served upon ⁽⁷⁾ PERSONS UNKNOWN

(8)Enter the full name and address for service and delete as required

This application is filed by ⁽⁸⁾ Wolverhampton City Council, (the Solicitors for) the Claimants whose address for service is Civic Centre, St Peter's Square, Wolverhampton,WV1 1RG

Signed



Dated 07 October 2022

* Name and address of the person application is directed to

To* of

This section to be completed by the court

This application will be heard by the (District) Judge

at

on

the

day of

20

at

o'clock

If you do not attend at the time shown the court may make an injunction order in your absence

If you do not fully understand this application you should go to a Solicitor, Legal Advice Centre or a Citizens' Advice Bureau

BETWEEN:

- (1) WOLVERHAMPTON CITY COUNCIL**
- (2) DUDLEY METROPOLITAN BOROUGH COUNCIL**
- (3) SANDWELL METROPOLITAN BOROUGH COUNCIL**
- (4) WALSALL METROPOLITAN BOROUGH COUNCIL**

Claimants

-and-

1. PERSONS UNKNOWN WHO PARTICIPATE BETWEEN THE HOURS OF 3:00 P.M. AND 7:00 A.M. IN A GATHERING OF 2 OR MORE PERSONS WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED) AT WHICH SOME OF THOSE PRESENT ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING

2. PERSONS UNKNOWN WHO PARTICIPATE BETWEEN THE HOURS OF 3:00 P.M. AND 7:00 A.M. IN A GATHERING OF 2 OR MORE PERSONS WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED) WITH THE INTENTION OR EXPECTATION THAT SOME OF THOSE PRESENT WILL ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING

3. PERSONS UNKNOWN PROMOTING ORGANISING PUBLICISING (BY ANY MEANS WHATSOEVER) ANY GATHERING BETWEEN THE HOURS OF 3:00 P.M. AND 7:00 A.M. OF 2 OR MORE PERSONS WITH THE INTENTION OR EXPECTATION THAT SOME OF THOSE PRESENT WILL ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED)

Respondents

BUNDLE OF EVIDENCE IN SUPPORT OF APPLICATION FOR AN INJUNCTION

A. SECTION A - STATEMENTS OF CASE

B. SECTION B - Global Overarching Statements

1.	Statement of Adam Sheen 4 October 2022	B 1 - B 3
2.	Overarching Statement of Pardip Nagra (For Wolverhampton) 19 July 2022	B 4 - B 35
3.	EXHIBIT PN1	B 36
4.	Exhibit PN1 - Statement of Lisa Fox (From 2014 Application) 02 11 2013	B 37 - B 40
5.	EXHIBIT PN2	B 41
6.	Exhibit PN2 - Statement of Peter James (From 2014 Application) 09 11 2013	B 42 - B 44
7.	EXHIBIT PN3	B 45
8.	Exhibit PN3 - Statement of Carl Yeomans (From 2014 Application) 07 11 2013	B 46 - B 49
9.	EXHIBIT PN4	B 50
10.	Exhibit PN4 - Statements of David Clark (From 2014 Application) 12 03 2014	B 51 - B 70
11.	EXHIBIT PN5	B 71
12.	Exhibit PN5 - Statement of Lisa Parmar (From 2014 Application) 22 05 2014	B 72 - B 88
13.	EXHIBIT PN6	B 89
14.	Exhibit PN6 - Statement of Lydia Pulford (From 2014 Application) 11 11 2013	B 90 - B 92
15.	EXHIBIT PN7	B 93
16.	Exhibit PN7 Statement of Fanella Bird (From 2014 Application) 23 11 2014	B 94 - B 95
17.	Exhibit PN7 Statement of Fanella Bird (From 2014 Application) 23 11 2014	B 96
18.	EXHIBIT PN8	B 97
19.	Exhibit PN8 - Statement of PC J Hartford (From 2014 Application) 16 11 2013	B 98 - B 99
20.	EXHIBIT PN9	B 100
21.	Exhibit PN9 - Statement of Richard Hardy (From 2014 Application) 06 11 2013	B 101 - B 103
22.	EXHIBIT PN10	B 104
23.	Exhibit PN10 - Statement of Police Inspector Julie Mason (From 2014 Application) 23 07 2014	B 105 - B 109
24.	EXHIBIT PN11 - (Video Footage Available Separately)	B 110
25.	EXHIBIT PN12	B 111
26.	Exhibit PN12 - E-mail from Lisa Fox 17 April 2021	B 112
27.	EXHIBIT PN13	B 113
28.	Exhibit PN13 - Express & Star Article 12 04 22 direct print from Website	B 114 - B 126
29.	Exhibit PN13 Print Friendly Version of E & S Article 12 04 2022	B 127 - B 129
30.	EXHIBIT PN14	B 130
31.	Exhibit PN14 - Letter from Councillor Leach to Wolverhampton ASB Team 05 22	B 131
32.	EXHIBIT PN15	B 132
33.	Exhibit PN15 - Letter from Pat McFadden MP 31 05 22	B 133
34.	EXHIBIT PN16	B 134
35.	Exhibit PN16 - Letter From Nicola Richards MP 25 04 22	B 135
36.	EXHIBIT PN17	B 136

37.	Exhibit PN17 - Version 1 Print Friendly Version of story published on E & S Website 15 08 2018	B 137 - B 142
38.	Exhibit PN17 Version 2 print from E & S Website 15 08 2018	B 143 - B 160
39.	EXHIBIT PN18	B 161
40.	Exhibit PN18 - Essex Live Article 5 April 2021 (Print Friendly Version)	B 162 - B 164
41.	Exhibit PN18 - Essex Live News 5 April 2021 - Report of Thurrock Car Meet From Essex News Website	B 165 - B 170
42.	EXHIBIT PN19	B 171
43.	Exhibit PN19 - Media release July 2022	B 172 - B 173
44.	Overarching Statement of Chief Superintendent Ian Green (West Midlands Police) 19 07 22	B 174 - B 176
45.	Overarching Statement of PC Mark Campbell (West Midlands Police) 15 07 22	B 177 - B 213
46.	EXHIBIT MRC1 - Video Footage (Available Separately)	B 214
47.	EXHIBIT MRC2 - Video Footage (Available Separately)	B 215
48.	EXHIBIT MRC3	B 216
49.	Exhibit MRC3 - Statement of PC Mark Campbell 13 July 2022	B 217 - B 224
50.	Witness Statement of Paul Brown (Communications Manager) (For Wolverhampton)16 September 2022	B 225 - B 227
51.	STREET RACING COMMUNICATIONS PLAN (FINAL VERSION) FOR BUNDLE	B 228 - B 236
52.	Comms Plan Appendix 1	B 237
53.	Comms Plan - APPENDIX 1	B 238 - B 239
54.	Comms Plan Appendix 2	B 240
55.	Comms Plan - APPENDIX 2	B 241 - B 242
56.	Comms Plan Appendix 3	B 243
57.	Comms Plan - APPENDIX 3	B 244 - B 245
58.	Comms Plan Appendix 4	B 246
59.	Comms Plan - APPENDIX 4	B 247 - B 248
60.	Comms Plan Appendix 5	B 249
61.	Comms Plan - APPENDIX 5	B 250 - B 251
62.	Comms Plan Appendix 6	B 252
63.	Comms Plan - APPENDIX 6	B 253
64.	Comms Plan Appendix 7	B 254
65.	Comms Plan - APPENDIX 7	B 255 - B 257
66.	Comms Plan Appendix 8	B 258
67.	Comms Plan - APPENDIX 8	B 259 - B 260
68.	Comms Plan Appendix 9	B 261
69.	Comms Plan - APPENDIX 9	B 262 - B 264
70.	Comms Plan Appendix 10	B 265
71.	Comms Plan - APPENDIX 10	B 266 - B 267
72.	Comms Plan Appendix 11	B 268
73.	Comms Plan - APPENDIX 11	B 269 - B 270

74.	Comms Plan Appendix 12	B 271
75.	Comms Plan - APPENDIX 12	B 272 - B 273
76.	Comms Plan Appendix 13 -	B 274
77.	Comms Plan - APPENDIX 13	B 275 - B 276
78.	Comms Plan Appendix 14	B 277
79.	Comms Plan - APPENDIX 14	B 278 - B 279
80.	Comms Plan Appendix 15	B 280
81.	Comms Plan - APPENDIX 15	B 281 - B 282
82.	Comms Plan Appendix: "Digital Signage"	B 283
83.	Comms Plan - APPENDIX DIGITAL SIGNAGE	B 284 - B 288
84.	Comms Plan Appendix "Signage 1"	B 289
85.	Comms Plan - Appendix signage 1 - Dudley Existing Signs	B 290
86.	Comms Plan Appendix "Signage 2"	B 291
87.	Comms Plan - Appendix signage 2 - Dudley Existing and Proposed Signs	B 292 - B 295
88.	Comms Plan Appendix "Signage 3"	B 296
89.	Comms Plan - Appendix Signage 3	B 297 - B 299
90.	Comms Plan Appendix "Signage 4"	B 300
91.	Comms Plan Appendix "Signage 5"	B 301
92.	Comms Plan - Appendix signage 5 - Walsall Existing Signs	B 302
93.	Comms Plan Appendix "Signage 6"	B 303
94.	Comms Plan - Appendix signage 6 - Walsall Existing and Proposed Signs	B 304 - B 306
95.	Comms Plan Appendix "Signage 7"	B 307
96.	Comms Plan - Appendix signage 7 - Wolverhampton Existing Signs	B 308 - B 317
97.	Comms Plan Appendix "Signage 8"	B 318
98.	Comms Plan - Appendix signage 8 - Wolverhampton Existing and Proposed Signs	B 319 - B 322

C. SECTIONC- Overarching Statements of Professionals for Each Claimant Local Authority

1.	Statement of Kathryn Jones 13 07 22 (For Dudley)	C 1 - C 5
2.	Witness Statement of Pardip Sandhu 27 September 2022	C 6 - C 12
3.	Exhibit Cover - Exhibit PS1 (Pardip Sandhu 27.9.2022)	C 13
4.	Exhibi PS1 To Statement of Pardip Sandhu 2022 car crusing incidents 2021 - 2022 with date of incidents	C 14 - C 36
5.	Exhibit Cover - Exhibit PS2 (Pardip Sandhu 27.9.2022)	C 37
6.	Statement of Steve Gittins 08 09 22 (For Walsall)	C 38 - C 44
7.	Exhibit Cover SJG1	C 45
8.	Exhibit SJG1 [Steve Gittins] (For Walsall)	C 46
9.	Exhibit Cover SJG2	C 47
10.	Exhibit SJG2 [Steve Gittins] (For Walsall)	C 48
11.	Exhibit Cover SJG3	C 49
12.	Exhibit SJG3 [Steve Gittins] (For Walsall)	C 50 - C 51

13.	Statement of Police Sergeant Lee Plant 15 07 22 (For Wolverhampton)	C 52 - C 53
14.	(MG11 Format) Police Sergeant Lee Plant Street racing - Wolverhampton	C 54 - C 74
15.	Statement of Police Constable Jonathan Edwards 12 05 22 (For Dudley)	C 75 - C 86
16.	Statement of Police Sergeant Richard Phillips 29 06 22 (For Sandwell)	C 87 - C 90
17.	Statement Police Inspector Phil Upton 09 06 22 (For Walsall)	C 91 - C 93
18.	Second Statement of Police Inspector Phil Upton 04 09 22 (For Walsall)	C 94 - C 104

D. SECTION D - Statements of Councillors, MPs, Residents and Business for Wolverhampton

1.	Witness Statement of Dharminder Dhaliwal (Wolverhampton) Tier 3	D 1 - D 2
2.	Witness Statement of Margaret Clemson (Wolverhampton) Tier 3	D 3 - D 4
3.	Witness Statement of Nicki Wellings (Wolverhampton) Tier 3	D 5
4.	Witness Statement of Taylor Harvey-Beardsmore (Wolverhampton) Tier 3	D 6
5.	Witness Statement of Teja Sidhu (Wolverhampton) Tier 3	D 7
6.	Witness Statement of Teresa Welburn (Wolverhampton) Tier 3	D 8
7.	Witness statement of Jennifer Bateman 26.05.22 (For Wolverhampton)	D 9 - D 12

E. SECTION E- Statements of Councillors, MPs, Residents and Business for Dudley

1.	Signed statement of James Morris MP (For Dudley)	E 1 - E 6
2.	Statement of Stacy Hewerdine - Waterfront Security 10-05-22 (For Dudley)	E 7 - E 12
3.	Exhibit Cover - EXHIBIT SH1 [Stacy Hewedine] (For Dudley) (Clearer Version of Exhibit SH1)	E 13
4.	EXHIBIT SH1 (Waterfront Car Park) [Stacy Hewerdine] (For Dudley) (Clearer Version)	E 14
5.	Signed statement of Richard Hubbard- Harris - Showcase 10-05-22 (For Dudley)	E 15 - E 22
6.	Exhibit Cover RHH1 [Richard Hubbard-Harris] (For Dudley) (Clearer Version of Exhibit RHH1)	E 23
7.	EXHIBIT RHH1 Car Park (Showcase Cinema, Dudley) [Richard Hubbard-Harris] (For Dudley) (Clearer Version)	E 24
8.	EXHIBIT RHH1 Front Car Park (Showcase Cinema, Dudley) [Richard Hubbard-Harris] (For Dudley) (Clearer Version)	E 25
9.	EXHIBIT RHH1 Rear Car Park (Showcase Cinema, Dudley) [Richard Hubbard-Harris] (For Dudley) (Clearer Version)	E 26
10.	Signed 2nd stmt of Richard Hubbard-Harris dated 14-09-22	E 27 - E 33
11.	Exhibit RHH2 - (Video Footage Available Separately)	E 34
12.	Exhibit RHH3 - Cover Sheet	E 35
13.	EXHIBIT RHH3	E 36 - E 40
14.	Exhibit RHH4 - Cover Sheet	E 41
15.	EXHIBIT RHH4	E 42
16.	Exhibit RHH5 - Cover Sheet	E 43
17.	EXHIBIT RHH5	E 44
18.	Exhibit RHH6 - Cover Sheet	E 45
19.	EXHIBIT RHH6	E 46 - E 47

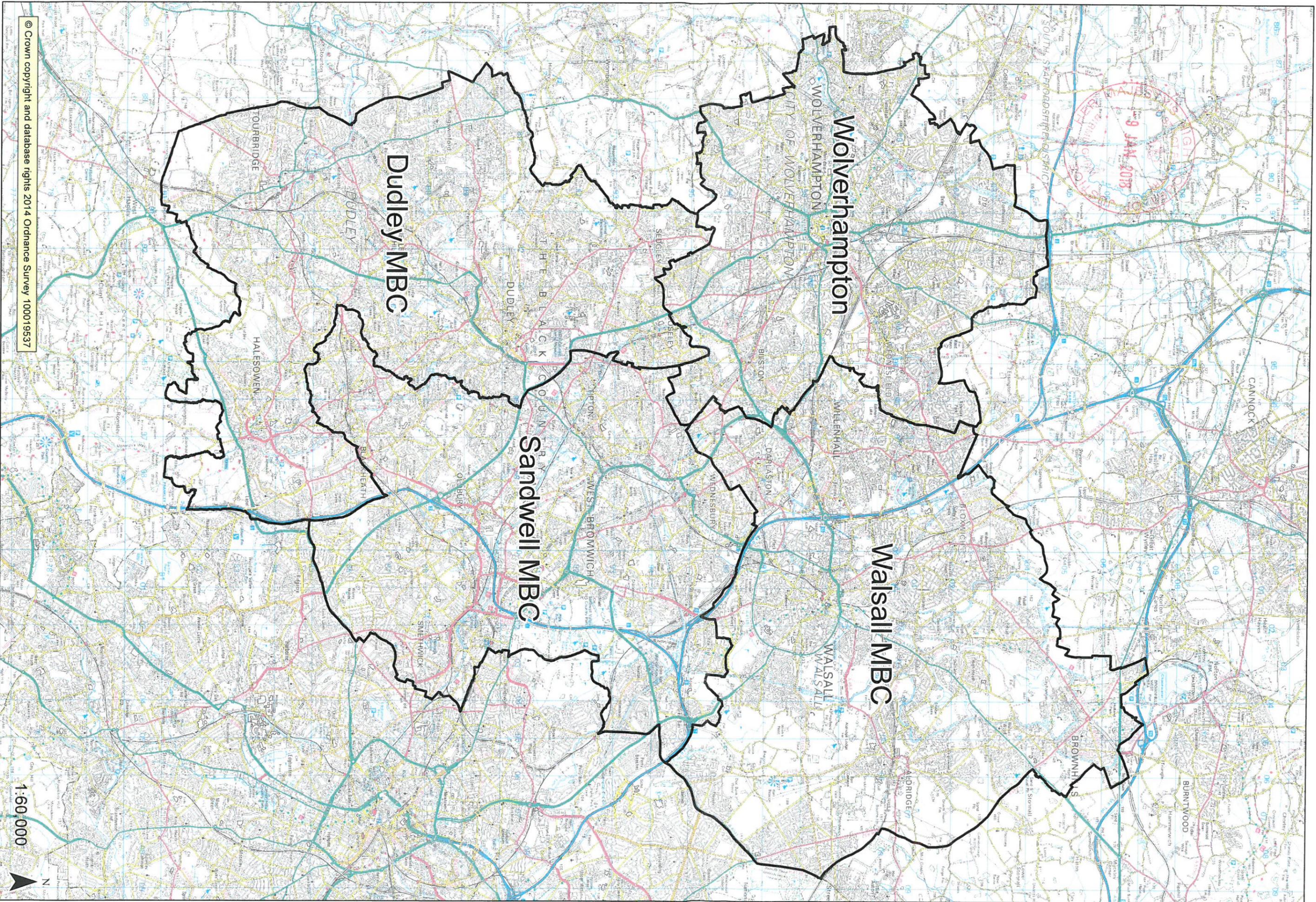
20.	Exhibit RHH7- Cover Sheet	E 48
21.	EXHIBIT RHH7	E 49
22.	Exhibit RHH8 - Cover Sheet	E 50
23.	EXHIBIT RHH8	E 51
24.	Signed statement of John Slater-Kiernan - Shell Garage 11-05-22 (For Dudley)	E 52 - E 56
25.	Exhibit Cover JSK1 [John Slater-Kiernan] (For Dudley)	E 57
26.	Statement of Chris Southall - Tesco 11-05-22 (For Dudley)	E 58 - E 62

F. SECTION F - Statements of Councillors, MPs, Residents and Business for Sandwell

1.	Letter from Nicola Richards MP 25 04 22	F 1
2.	Witness Statement of Donata Halasa (Sandwell) 10 06 22	F 2 - F 3
3.	Witness Statement of John Gallagher (Sandwell) 31 05 22	F 4 - F 5
4.	Witness Statement of Nicki Wellings (Wolverhampton) 11 06 22	F 6
5.	Witness Statement of Ronald Hill (Sandwell) 31 05 22	F 7
6.	Witness Statemet of Sheila Powell (Sandwell) 10 06 22	F 8 - F 9

G. SECTION G - Statements of Councillors, MPs, Residents and Business for Walsall

1.	Witness Statement of Simon Pearson (Walsall) 28 04 22	G 1 - G 2
2.	Witness Statement of Kelly Matthews (Walsall) 28 04 22	G 3 - G 4
3.	Witness Statement of Julia Westwood (Walsall) 13 05 2022	G 5 - G 6
4.	Witness Statement of Lee Roden (Walsall) 21 05 2022	G 7 - G 8
5.	Witness Statement of Robert Norton (Walsall) 22 05 2022	G 9 - G 10
6.	Witness Statement of Ravdeep Khara (Walsall) 24 05 2022	G 11 - G 12



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I N J U N C T I O N

I N T H E H I G H C O U R T O F J U S T I C E K I N G ' S B E N C H D I V I S I O N B I R M I N G H A M D I S T R I C T R E G I S T R Y

B E T W E E N:

Claim no:

(1) WOLVERHAMPTON CITY COUNCIL

**(2) DUDLEY METROPOLITAN BOROUGH
COUNCIL**

**(3) SANDWELL METROPOLITAN BOROUGH
COUNCIL**

**(4) WALSALL METROPOLITAN BOROUGH
COUNCIL**

Claimants

- AND -

1. Persons Unknown who participate between the hours of 3:00 p.m. and 7:00 a.m. in a gathering of 2 or more persons within the Black Country Area shown on Plan A (attached) at which some of those present engage in motor racing or motor stunts or other dangerous or obstructive driving

2 Persons Unknown who participate between the hours of 3:00 p.m. and 7:00 a.m. in a gathering of 2 or more persons within the Black Country Area shown on Plan A (attached) with the intention or expectation that some of those present will engage in motor racing or motor stunts or other dangerous or obstructive driving

3. Persons Unknown promoting organising publicising (by any means whatsoever) any gathering between the hours of 3:00 p.m. and 7:00 a.m. of 2 or more persons with the intention or expectation that some of those present will engage in motor racing or motor stunts or other dangerous or obstructive driving within the Black Country Area shown on Plan A (attached)

Defendants

To:	<p>1. Persons Unknown who participate between the hours of 3:00 p.m. and 7:00 a.m. in a gathering of 2 or more persons within the Black Country Area shown on Plan A (attached) at which some of those present engage in motor racing or motor stunts or other dangerous or obstructive driving</p> <p>2. Persons Unknown who participate between the hours of 3:00 p.m. and 7:00 a.m. in a gathering of 2 or more persons within the Black Country Area shown on Plan A (attached) with the intention or expectation that some of those present will engage in motor racing or motor stunts or other dangerous or obstructive driving</p> <p>3. Persons Unknown promoting organising publicising (by any means whatsoever) any gathering between the hours of 3:00 p.m. and 7:00 a.m. of 2 or more persons with the intention or expectation that some of those present will engage in motor racing or motor stunts or other dangerous or obstructive driving within the Black Country Area shown on Plan A (attached)</p>
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Claimants	WOLVERHAMPTON CITY COUNCIL & OTHERS
Defendants	<p>1. Persons Unknown who participate between the hours of 3:00 p.m. and 7:00 a.m. in a gathering of 2 or more persons within the Black Country Area shown on Plan A (attached) at which some of those present engage in motor racing or motor stunts or other dangerous or obstructive driving</p> <p>2. Persons Unknown who participate between the hours of 3:00 p.m. and 7:00 a.m. in a gathering of 2 or more persons within the Black Country Area shown on Plan A (attached) with the intention or expectation that some of those present will engage in motor racing or motor stunts or other dangerous or obstructive driving</p> <p>3. Persons Unknown promoting organising publicising (by any means whatsoever) any gathering between the hours of 3:00 p.m. and 7:00 a.m. of 2 or more persons with the intention or expectation that some of those present will engage in motor racing or motor stunts or other dangerous or obstructive driving within the Black Country Area shown on Plan A (attached)</p>

PENAL NOTICE

IF YOU THE WITHIN NAMED DEFENDANTS OR ANY OF YOU DO NOT COMPLY WITH THIS ORDER, YOU MAY BE HELD IN CONTEMPT OF COURT AND IMPRISONED OR FINED OR YOUR ASSETS MAY BE SEIZED

IMPORTANT NOTICE TO THE DEFENDANTS

This Order prohibits you from doing the acts set out in this Order. You should read it very carefully. You are advised to consult a solicitor as soon as possible. You have the right to ask the Court to vary or discharge this Order but you must obey the order unless it is varied or discharged by the Court.

A Defendant who is an individual who is ordered not to do something must not do it himself/herself or in any other way. He/she must not do it through others acting on his/her behalf or on his/her instructions or with his/her encouragement.

Before sitting, at the High Court of Justice, Birmingham District Registry, Priory Courts, 33 Bull Street, Birmingham, B4 6DS on

UPON the Claimants' application, by an Application Notice dated , for an injunction pursuant to section 222 Local Government Act 1972 and section 130 Highways Act 1980 and the Court exercising its discretion to grant injunctive relief pursuant to section 37(1) Senior Courts Act 1981

AND UPON making an Order on making directions and approving service in respect of the Claim Form, the Claimant's Application and the evidence in support by alternative means pursuant to CPR r. 6.15 and r. 6.27.

AND UPON the Claimants confirming that this Order is not intended to prohibit lawful motorsport taking place on private land where planning permission has been granted and such activities take place under an approved code or licence from a recognised regulatory body.

AND UPON hearing Counsel for the Claimants

IT IS ORDERED THAT:

Service by Alternative Method-Proceedings

1. Pursuant to CPR r. 6.15 and r.6.27, the steps that the Claimants have taken to serve the Claim, the Application and the evidence in support on the Defendants shall amount to good and proper service of the proceedings on the Defendants and each of them.

Injunction in force

- 2. IT IS FORBIDDEN for the Defendants to participate between the hours of 3:00 p.m. and 7:00 a.m. in a gathering of 2 or more persons within the Black Country Area shown on Plan A (attached) at which some of those present engage in motor racing or motor stunts or other dangerous or obstructive driving.**

- 3. IT IS ALSO FORBIDDEN for the Defendants to participate between the hours of 3:00 p.m. and 7:00 a.m. in a gathering of 2 or more persons within the Black Country Area shown on Plan A (attached) with the intention or expectation that some of those present will engage in motor racing or motor stunts or other dangerous or obstructive driving**

- 4. IT IS ALSO FORBIDDEN for the Defendants to promote organise publicise (by any means whatsoever) any gathering between the hours of 3:00 p.m. and 7:00 a.m. of 2 or more persons with the intention or expectation that some of those present will engage in motor racing or motor stunts or other dangerous or obstructive driving within the Black Country Area shown on Plan A (attached)**

Stunts are driving manoeuvres often undertaken at such gatherings including but not limited to:

- a. “Burnouts” – Causing a vehicle to destroy its tyres by applying power to the drive wheels while braking so as to remain in place while the wheels revolve at speed.
 - b. “Donuts/Donutting” – Causing a vehicle to rotate around a fixed point (normally the front axle) while not moving-off causing noise, smoke and tyre marks to be created.
 - c. “Drifting” – Turning by placing the vehicle in a skid so that most sideways motion is due to the skid not any significant steering input.
 - d. “Undertaking” – Passing a vehicle on its nearside so as to overtake in circumstances not permitted by the Highway Code
- 5. A Power of Arrest pursuant to section 27 Police and Criminal Justice Act 2006 shall apply to clauses 2 & 3 of this Order.**

Service by Alternative Method - This Order

6. The Court will provide copies of this Order to the Claimants' solicitors (whose details are set out below) for service.
7. Pursuant to CPR r 6.27 and r 81.4:

The Claimants shall serve this Order upon the Defendants by :

- a. Issuing a media release highlighting the granting of the High Court injunction and power of arrest. Such release shall be made to, but is not limited to, local print publications including the Express and Star, Chronicle Week, the Birmingham Mail, Halesowen & Dudley News and Stourbridge News; local radio stations including BBC WM, Free Radio, Signal 107, WCR FM and Heart, and BBC Midlands Today and ITV Central.
- b. Placing on the Claimants' social media including Twitter and Facebook links to the above media release regarding the granting of the High Court injunction and power of arrest and highlighting introduction of injunction and power of arrest.
- c. Updating the dedicated pages on the websites of Wolverhampton City Council, Dudley Council, Sandwell Council and Walsall Council about the injunction and power of arrest, and date of introduction of the injunction at the following webpages:

<https://www.wolverhampton.gov.uk/street-racing-injunction>

<https://www.dudley.gov.uk/residents/parking-and-roads/roads-highways-and-pavements/car-cruising-injunction>

https://www.sandwell.gov.uk/info/200284/roads_travel_and_parking/3231/street_racing

https://go.walsall.gov.uk/black_country_car_cruising_injunction

Such pages shall carry a direct link to this order.

- d. Placing a copy of the injunction and power of arrest in the Express & Star and Chronicle Week newspapers

- e. Uploading to the video sharing website “You Tube”, a video of someone presenting and reciting a copy of the terms of the Injunction with a stark warning that should people be participate in car cruising in the Black Country they may be in breach of the Injunction and liable to committal proceedings for contempt of court which could result in the court imposing: a sentence of imprisonment; a fine; or an order seizing a person’s assets.
- f. Erecting and maintaining official road signs (fixed, temporary and electronic) throughout the Black Country Area in locations that are, or have been, hotspots of car cruising activity stating “HIGH COURT INJUNCTION PROHIBITING CAR CRUISING IN FORCE IN THIS AREA”
- g. Ensuring that copies of the Injunction and Power of Arrest are available at the front desks of the Claimants’ main offices. West Midlands Police will ensure that copies of the Injunction and Power of Arrest are available at the front desks of their stations throughout the Black Country Area.

8. These steps shall be completed by

Commencement, Term and Duration

9. This Order & Power of Arrest shall come into effect at 12.01 a.m. (00:01 hours) on , provided that the Claimants, by their proper officer have given to the court written notice that the steps identified at paragraph 8 above have been completed. [Such notice shall be by a witness statement/s from the Claimants’ proper officer (solicitor or administrative staff official)].

10. This Order & Power of Arrest shall, expire at 11.59 p.m. (23:59 hours) on unless it is extended, varied or discharged by further order of the court.

Further Case Management

11. A review hearing will take place in open court (elh 30 minutes) before a Judge of the High Court (section 9 if practicable) after this order has been in force for 12 months and no longer than 14 months. The Claimants shall file with the court a succinct report to inform the court of their experience with the publication, operation and enforcement of the extended order, including for example, breaches, warnings or problems, if any arising out the extended order (including the Power of Arrest).
12. Without prejudice to the foregoing, any person affected by this Order may apply to the Court at any time to vary or discharge it but if they wish to do so they must inform the Claimants' solicitors immediately (and in any event not less than 48 hours before the hearing of any such application) via the contact details set out below. Schedule A to this Order indicates the process which must be followed for any such application. Useful sources of support and information are listed in Schedule C.
13. Any person applying to vary or discharge this Order must provide their full name and address, an address for service, and must also apply to be joined as a Named Defendant to the proceedings at the same time.
14. Any Person who believes that they will or might bring themselves within the definition of the "persons unknown" by their conduct and who wishes to oppose these proceedings should file an Acknowledgment of Service pursuant to CPR Part 8.3 and serve a copy on the Claimants solicitors via the email address set out in paragraph 21 below. Schedule B to this Order indicates the process which must be followed.
15. Any Defendant who fails to comply with paragraph 14 above shall not be permitted to defend these proceedings or take any further role in these proceedings without further order of the Court and shall be liable to have injunctive relief continued against them without trial pursuant to CPR r. 3.5.
16. The Claimants otherwise have permission to apply to extend or vary this Order or for further directions.

17. Save as provided for above, the Claim be stayed generally with liberty to restore.

Documents in the Claim and Application

18. A single hard copy of any document will be sent within 21 days of the receipt of a reasonable request for that document or documents via the Claimants' solicitors whose contact details are set out below so long as any requests include a postal address and the full name of the requestor.

Communications with Claimants and the Court

19. All communications to the Court about this Order (which should quote the case number) should be sent to:

Birmingham District Registry Civil Justice Centre
Priory Courts
33 Bull Street
Birmingham
B4 6DW

E: qb.birmingham@justice.gov.uk T: 0121 681 4441
F: 01264 785 131
DX: 701987 Birmingham 7

20. Any person who wishes to view or download copies of the documents shall contact the Claimants' solicitors via the contact details below.

21. The Claimants' solicitors and their contact details are:

FAO: Black Country Car Cruise
Legal Services
Wolverhampton City Council
Civic Centre
St Peters Square
Wolverhampton
WV1 1RG

E: litigation@wolverhampton.gov.uk
T: 01902 556556
DX: 744350 Wolverhampton 27
Ref: LIT/AS/WHA017753P

Dated:

SCHEDULE A – STEPS TO VARY OR DISCHARGE THIS ORDER

If, in accordance with paragraph 12 above, any Defendant or any other person affected by this Order wishes to apply to vary or discharge this Order, to ensure effective case management by the Court the following indicative steps must be followed:

1. Any person seeking to contest the Claimants' entitlement to interim relief should file with the court (i.e. send to the court) and serve (i.e. send to the Claimants):

(a) An N244 application form¹;

(b) Written grounds (which may be contained in within the N244 application form or a separate document) for:

- i. permission to bring the application; and
- ii. the application (i.e. reasons for the proposed variation / discharge of the Order).

(c) A witness statement(s) containing and/or appending all of the evidence to be relied upon in support of the application.

2. In order to file the above documents with the Court, the applicant should:

(a) Send physical copies of the documents to the address at paragraph 19 of this Order; and/or

(b) Speak to the Court to obtain an address to send electronic copies of the documents to.

3. In order to serve the above documents on the Claimants, the applicant should:

(a) Send physical copies of the documents to the address at paragraph 21 of this Order; and/or

(b) Send electronic copies of the documents to the e-mail address at paragraph 21 above.

4. The person making the application should indicate to the Court and Claimants whether they consider the matter requires a court hearing or can be dealt with by the judge reviewing the paper application and any response from the Claimants.

5. Thereafter the Claimants shall have 14 days to file and serve evidence and submissions in response, including as to whether an oral hearing is required to determine the application.

6. Within 21 days, the Court shall decide:

a whether to grant permission for the application to proceed; and

b if permission is granted, whether a hearing is necessary, and/or may request from the parties evidence on any further matters necessary to determine the application. If the Court decides that a hearing is necessary, it shall seek to schedule the hearing (accommodating availabilities of the parties) within 42 days (6 weeks).

¹ 1 See the following link which provides a digital version of the form, and guidance notes:
<https://www.gov.uk/government/publications/form-n244-application-notice>

7. If the Court decides that further evidence is needed from any party, it may set strict deadlines by which that evidence must be filed. Both parties should be aware that the Court may restrict the use of evidence which is filed late or impose other penalties for non-compliance.

SCHEDULE B – STEPS TO BRING MATTER TO TRIAL

If, in accordance with paragraph 14 above, any Defendant or other person affected by this Order wishes to apply bring the Claimants' proceedings (whether as a whole or in part) to final trial, to ensure effective case management by the Court the following steps must be followed:

1. If not already so, the person must apply to become a named defendant to the claim. This can be done by filing with the court (i.e. send to the court) and serving (i.e. send to the Claimants)

(a) An N244 Application form²; and

(b) a short statement explaining the reason for applying to become a named defendant (i.e. in order to contest the Claimants' claim).

2. In order to file the above with the Court, the person who is applying should:

(a) Send physical copies to the address at paragraph 19 of this Order; and/or

(b) Speak to the Court to obtain an address to send electronic copies to.

3. In order to serve the above on the Claimants, the person applying should:

(a) Send physical copies to the address at paragraph 21 of this Order; and/or

(b) Send electronic copies to the to the e-mail address at paragraph 21 above.

4. The person seeking to contest the Order and bring the matter to trial must then file and serve (see above as to how this is to be done):

(a) An Acknowledgement of Service using form N210³, explaining the reasons for contesting the Order (whether as a whole or in part), which must include a postal address for service together with (if they wish to be served with documents electronically in these proceedings) an email address to which such service may be effected;

(b) An application for permission to contest the Order and to bring the matter to trial, which explains clearly the differences between their grounds of defence relied upon and the issues which the Court has already adjudicated upon when granting this Order on . The Claimants shall obtain a transcript of the judgment which shall be available on the dedicated pages of their websites;

(c) A written Defence responding to the allegations set out in the Particulars of Claim (to the extent in the Defendant's knowledge); and

(d) A witness statement(s) (verified by a statement of truth) containing and/or appending all the evidence to be relied upon in support of the application for permission and Defence (i.e. evidence explaining the basis for contesting the claim).

² See the following link which provides a digital version of the form, and guidance notes:

<https://www.gov.uk/government/publications/form-n244-application-notice>

³ <https://www.gov.uk/government/publications/form-n210-acknowledgment-of-service-cpr-part-8>

5. Thereafter the Claimants shall have 14 days after service of the Defence to file and serve any evidence in reply.

6. The Court shall then list a hearing date for a Case Management Conference, at which it will:

(a) determine the application for permission to contest the Order and to bring the matter to trial; and

(b) should the application for permission be successful, give directions to parties for any further steps required prior to the final trial (such as filing further evidence). The Court may set strict deadlines by which the further steps must be taken and both parties should be aware that the Court may restrict the use of evidence which is filed late or impose other penalties for non-compliance.

7. Further:

- a. The Claimants shall prepare an electronic hearing bundle for the hearing and provide the Defendant(s) with access to the bundle not less than 14 days before the hearing.
- b. At the hearing, the Court shall consider whether injunctive relief shall be continued against any or all of the Defendants, whether on an interim or final basis.
- c. Any further application by the Claimants to add further named defendants, to have final relief granted against any Defendant(s) without trial pursuant to CPR r.3.5 and/or otherwise to amend its claim shall be determined at the hearing.
- d. The need for and form of any further case management directions through to trial or any further hearing shall be considered.

SCHEDULE C – USEFUL REFERENCES AND RESOURCES

The attention of all parties is drawn to the following references and resources:

Bar Pro Bono Unit – A possible avenue for obtaining free legal advice and/or representation:
<https://weareadvocate.org.uk/>

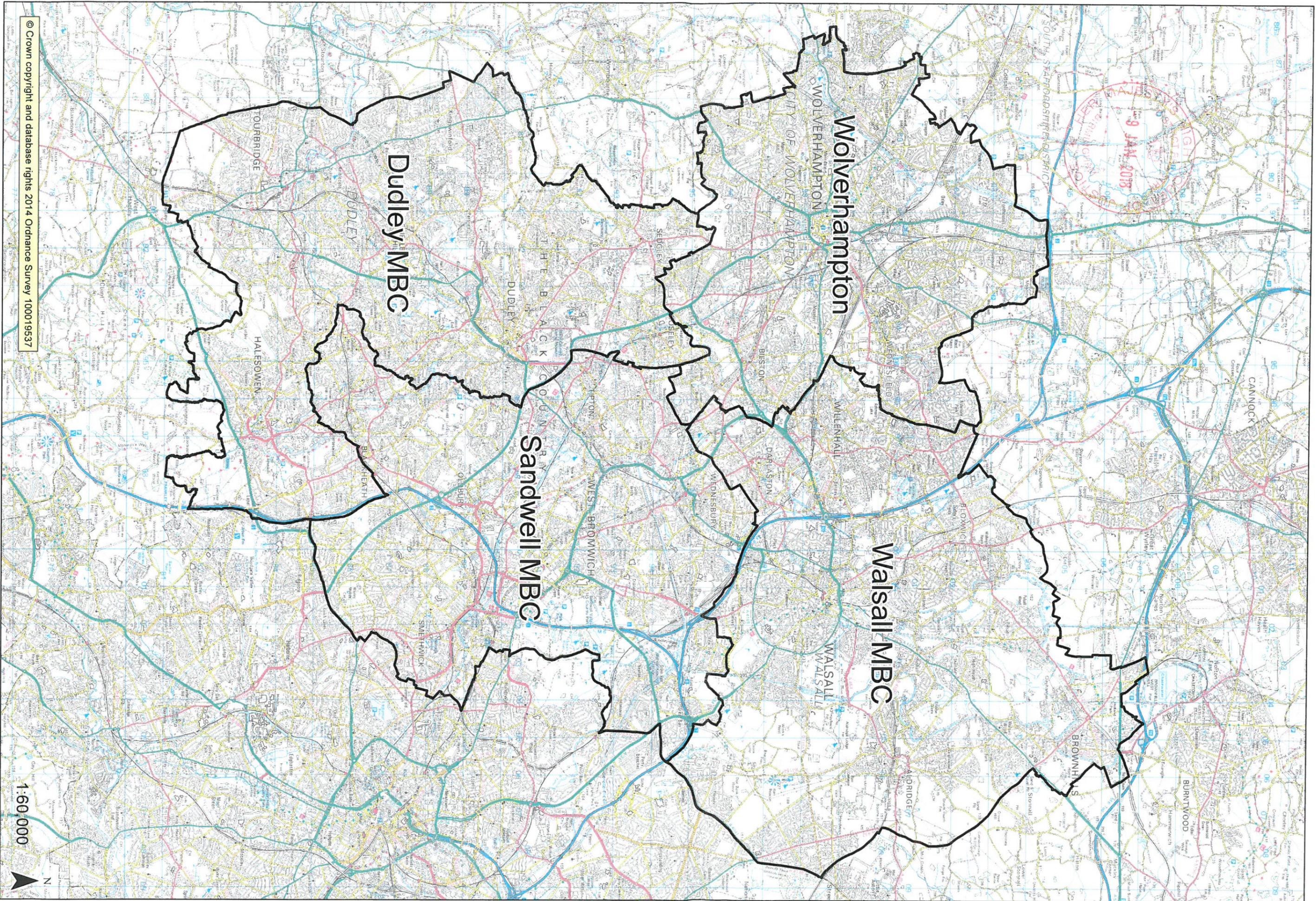
Support Through Court (formerly Personal Support Unit) – An organisation supporting litigants in person: <https://www.supportthroughcourt.org>

King’s Bench Division Guide: <https://www.judiciary.uk/guidance-and-resources/kings-bench-division-guide-2022-2/>

A Handbook for for Litigants in Person: <https://www.judiciary.uk/guidance-and-resources/handbook-litigants-person-civil-221013>

Civil Procedure Rules Part 8: <https://www.justice.gov.uk/courts/procedurerules/civil/rules/part08>

Help with Court Fees website: <https://www.gov.uk/get-help-with-court-fees>



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B E T W E E N:

<p>(1) WOLVERHAMPTON CITY COUNCIL (2) DUDLEY METROPOLITAN BOROUGH COUNCIL, (3) SANDWELL METROPOLITAN BOROUGH COUNCIL (4) WALSALL METROPOLITAN BOROUGH COUNCIL</p>	Claimants
<p>(1) PERSONS UNKNOWN WHO PARTICIPATE BETWEEN THE HOURS OF 3:00PM AND 7:00AM IN A GATHERING OF 2 OR MORE PERSONS WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED) AT WHICH SOME OF THOSE PRESENT ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING</p> <p>(2) PERSONS UNKNOWN WHO PARTICIPATE BETWEEN THE HOURS OF 3:00PM AND 7:00AM IN A GATHERING OF 2 OR MORE PERSONS WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED) WITH THE INTENTION OR EXPECTATION THAT SOME OF THOSE PRESENT WILL ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING</p> <p>(3) PERSONS UNKNOWN PROMOTING ORGANISING PUBLICISING (BY ANY MEANS WHATSOEVER) ANY GATHERING BETWEEN THE HOURS OF 3:00PM AND 7:00AM OF 2 OR MORE PERSONS WITH THE INTENTION OR EXPECTATION THAT SOME OF THOSE PRESENT WILL ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED)</p>	Defendants

**INJUNCTION - SECTION 37(1) SENIOR COURTS ACT 1981
(PROCEEDINGS BROUGHT PURSUANT TO SECTION 222 LOCAL GOVERNMENT ACT 1972)**

POWER OF ARREST

Under section 27 Police and Criminal Justice Act 2006



The court orders that a power of arrest under section 27 Police and Criminal Justice Act 2006 applies to the following paragraph(s) of an order made on

WOLVERHAMPTON CITY COUNCIL & OTHERS v PERSONS UNKNOWN

(Here set out the provisions of the order to which this power of arrest applies and no others).

(Where marked * delete as appropriate)

2. **IT IS FORBIDDEN for the Defendants to participate between the hours of 3:00 p.m. and 7:00 a.m. in a gathering of 2 or more persons within the Black Country Area shown on Plan A (attached) at which some of those present engage in motor racing or motor stunts or other dangerous or obstructive driving.**
3. **IT IS ALSO FORBIDDEN for the Defendants to participate between the hours of 3:00 p.m. and 7:00 a.m. in a gathering of 2 or more persons within the Black Country Area shown on Plan A (attached) with the intention or expectation that some of those present will engage in motor racing or motor stunts or other dangerous or obstructive driving**

“Stunts” are driving manoeuvres often undertaken at such gatherings including but not limited to:

- a. “Burnouts” – Causing a vehicle to destroy its tyres by applying power to the drive wheels while braking so as to remain in place while the wheels revolve at speed.
- b. “Donuts/Donutting” – Causing a vehicle to rotate around a fixed point (normally the front axle) while not moving-off causing noise, smoke and tyre marks to be created.
- c. “Drifting” – Turning by placing the vehicle in a skid so that most sideways motion is due to the skid not any significant steering input.
- d. “Undertaking” – Passing a vehicle on its nearside so as to overtake in circumstances not permitted by the Highway Code

POWER OF ARREST

In respect of a power of arrest under section 27 Police and Criminal Justice Act 2006, the Court, upon being satisfied pursuant to section 27(3) Police and Criminal Justice Act 2006 that the relevant conduct consists of or includes the use or threatened use of violence and/or there is a significant risk of harm to a person mentioned in section 27(2) of the said Act, has ordered that a power of arrest be attached to the order.

A power of arrest is attached to the order whereby any constable may (under the power given by Section 27(4) Police and Criminal Justice Act 2006) arrest without a warrant a person whom he has reasonable cause for suspecting to be in breach of any of the provisions set out in this order or otherwise in contempt of court in relation to such provision.

This Power of Arrest

Shall come into effect on 12.01 a.m. (00:01 hours) on _____ and shall continue until 11:59 pm (23:59 hours) on _____, unless it is extended, varied or discharged by further order of the court.

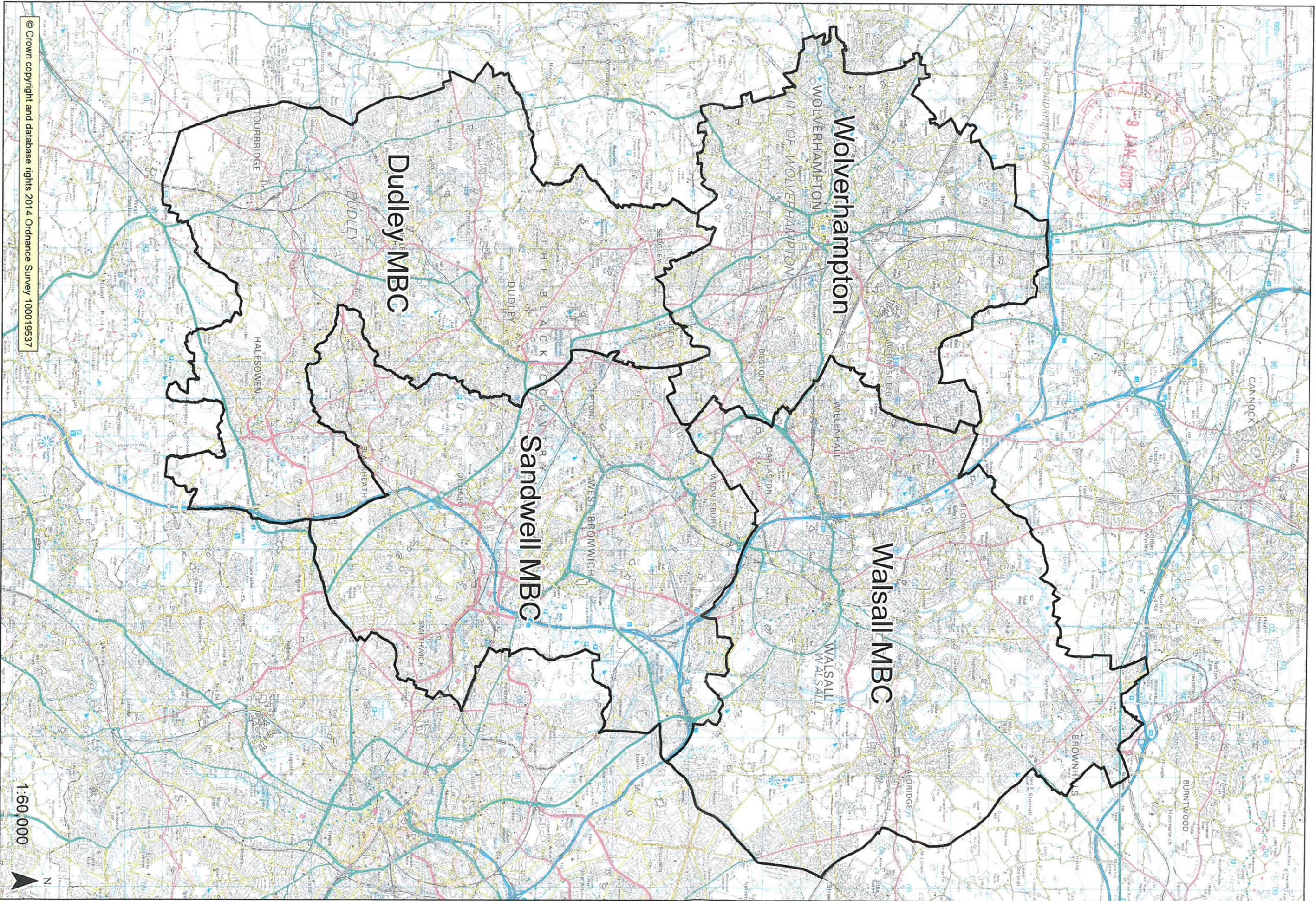
**Note to the
Arresting Officer**

Where a person is arrested under the power given by section 27(4) Police and Criminal Justice Act 2006, section 27(6) Police and Criminal Justice Act 2006 requires that:

- A constable shall, after making such an arrest, forthwith inform the person on whose application the injunction was granted;
- Such person shall be brought before the relevant judge within 24 hours beginning at the time of his arrest; And if the matter is not then disposed of forthwith, the Judge may remand such person.
- Nothing in section 155 authorises the detention of such person after the expiry of the period of 24 hours beginning at the time of his arrest, unless remanded by the court.
- In reckoning any period of 24 hours for these purposes, no account shall be taken of Christmas Day, Good Friday or any Sunday.

Ordered by

On



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Application notice

For help in completing this form please read the notes for guidance form N244Notes.

Find out how HM Courts and Tribunals Service uses personal information you give them when you fill in a form: <https://www.gov.uk/government/organisations/hm-courts-and-tribunals-service/about/personal-information-charter>

Name of court High Court of Justice	Claim no.
Fee account no. (if applicable)	Help with Fees – Ref. no. (if applicable)
PBA0082797	H W F - <input type="text"/> <input type="text"/> <input type="text"/> - <input type="text"/> <input type="text"/> <input type="text"/>
Warrant no. (if applicable)	
Claimant's name (including ref.) WOLVERHAMPTON CITY COUNCIL & OTHERS (LIT/AS/LIJ017753P)	
Defendant's name (including ref.) PERSONS UNKNOWN	
Date	07 October 2022

1. What is your name or, if you are a legal representative, the name of your firm?

WOLVERHAMPTON CITY COUNCIL

2. Are you a Claimant Defendant Legal Representative
 Other (please specify)

If you are a legal representative whom do you represent?

The Claimants

3. What order are you asking the court to make and why?

Pursuant to CPR rules 6.15 and 6.27, the Claimants invite the Court to make an order that they be permitted to serve their application for injunction to restrain street racing and associated activities within the Black Country area (which the Claimants further invite the court to reinforce with a power of arrest) by means of alternative service as specified in the draft order attached hereto.

4. Have you attached a draft of the order you are applying for? Yes No

5. How do you want to have this application dealt with? at a hearing without a hearing
 at a remote hearing

6. How long do you think the hearing will last? Hours Minutes
Is this time estimate agreed by all parties? Yes No

7. Give details of any fixed trial date or period

None

8. What level of Judge does your hearing need?

High Court Judge

9. Who should be served with this application?

Persons Unknown

9a. Please give the service address, (other than details of the claimant or defendant) of any party named in question 9.

10. What information will you be relying on, in support of your application?

- the attached witness statement
- the statement of case
- the evidence set out in the box below

If necessary, please continue on a separate sheet.

1. The Claimants seek an order pursuant to rules 6.15 and 6.27 of the Civil Procedure Rules that they be permitted to serve the claim form, application for injunction to restrain street racing and associated activities within the Black Country area (which the Claimants further invite the court to reinforce with a power of arrest) together with supporting evidence (hereinafter referred to together as the "Injunction Application", by means of alternative service as specified in the draft order attached hereto.

2. The Claimants also respectfully invite the Court to make any directions it sees fit regarding the Injunction Application prior to the substantive hearing of the same which the Claimants respectfully invite the Court to list with a time estimate of 1 day.

3. At the substantive hearing in respect of the Injunction Application, the Claimants will further respectfully invite the Court to make an order that, pursuant to rule 81.8 of the Civil Procedure Rules, they be permitted to serve any injunction and power of arrest granted by the alternative methods of service specified within the draft order for Injunction.

4. The Claimants respectfully draw the honourable Court's attention to the witness statement of Paul Brown, Communications Manager of Wolverhampton City Council, dated 7 October 2022 appended hereto. This statement details the steps the Claimants propose to take in order to effect substituted service of the Injunction Application on "Persons Unknown".

5. The Claimants further respectfully draw the honourable Court's attention to the witness statement of Paul Brown, Communications Manager of Wolverhampton City Council, dated 16 September 2022 and the Communications Plan exhibited thereto which appears at page B225 et seq. of the bundle of documents filed by the Claimants in support of their Injunction Application. This statement details the steps the Claimants propose to take not only in respect of serving notice of the Injunction Application on Persons Unknown, but also details the steps the Claimants propose to take to effect service of any injunction and power of arrest the Court may decide to grant at any substantive hearing of the Injunction Application.

6. The Claimants will respectfully contend that, regionally and nationally, there is a very wide interest in street racing and associated activities. The pool of people who choose to participate in, spectate at or organise street racing events is thus immeasurable and can never be fully known to the police and local authorities. Similarly, those people who choose to participate in, spectate at or organise street racing events, whether on a pre-determined or impromptu basis varies hugely from event to event. The Claimants respectfully aver it is wholly impossible, therefore, to identify named individuals and why the Claimants have, in their respectful contentions, necessarily sought this Injunction Application against Persons Unknown (as further defined in the action title).

7. The Claimants will aver that any injunction and power of arrest the court may grant, together with notice of the Injunction Application and the Injunction Application itself, is likely to reach the attention of Persons Unknown by the extensive methods prescribed in the witness statements of Paul Brown, referred to above, and by the methods provided in the draft order permitting alternative service of the Claim form appended hereto and further by the methods provided in the draft order for injunction itself which appears within Part A of the bundle of documents filed by the Claimants in support of their Injunction Application.

8. The Claimants thus respectfully invite the honourable Court to grant an order permitting alternative service as set out in the terms of the draft order permitting alternative service as appended to this application, or in such terms as the honourable Court deems fit.

11. Do you believe you, or a witness who will give evidence on your behalf, are vulnerable in any way which the court needs to consider?

Yes. Please explain in what way you or the witness are vulnerable and what steps, support or adjustments you wish the court and the judge to consider.

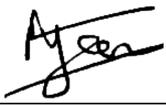
No

Statement of Truth

I understand that proceedings for contempt of court may be brought against a person who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

- I believe that the facts stated in section 10 (and any continuation sheets) are true.
- The applicant believes that the facts stated in section 10 (and any continuation sheets) are true. I am authorised by the applicant to sign this statement.

Signature



- Applicant
- Litigation friend (where applicant is a child or a Protected Party)
- Applicant's legal representative (as defined by CPR 2.3(1))

Date

Day Month Year

Full name

Name of applicant's legal representative's firm

If signing on behalf of firm or company give position or office held

Applicant's address to which documents should be sent.

Building and street

Wolverhampton City Council, Civic Centre

Second line of address

St Peter's Square

Town or city

Wolverhampton

County (optional)

West Midlands

Postcode

W	V	1		1	R	G
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If applicable

Phone number

01902 556556

Fax phone number

DX number

744350 Wolverhampton 27

Your Ref.

LIT/AS/LIJ017753P

Email

litigation@wolverhampton.gov.uk

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION
BIRMINGHAM DISTRICT REGISTRY

Claim No.

In the matter of an application for an injunction under s.222 Local
Government Act 1972 and s.130 of the Highways Act 1980

B E T W E E N:-

1. WOLVERHAMPTON CITY COUNCIL
2. DUDLEY METROPOLITAN BOROUGH COUNCIL
3. SANDWELL METROPOLITAN BOROUGH COUNCIL
4. WALSALL METROPOLITAN
BOROUGH COUNCIL

Claimants

-and-

1. PERSONS UNKNOWN WHO PARTICIPATE BETWEEN THE HOURS OF
3:00PM AND 7:00AM IN A GATHERING OF 2 OR MORE PERSONS WITHIN
THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED) AT
WHICH SOME OF THOSE PRESENT ENGAGE IN MOTOR RACING OR
MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING

2 PERSONS UNKNOWN WHO PARTICIPATE BETWEEN THE HOURS OF
3:00PM AND 7:00AM IN A GATHERING OF 2 OR MORE PERSONS WITHIN
THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED) WITH THE
INTENTION OR EXPECTATION THAT SOME OF THOSE PRESENT WILL
ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER
DANGEROUS OR OBSTRUCTIVE DRIVING

3. PERSONS UNKNOWN PROMOTING ORGANISING PUBLICISING (BY ANY
MEANS WHATSOEVER) ANY GATHERING BETWEEN THE HOURS OF
3:00PM AND 7:00AM OF 2 OR MORE PERSONS WITH THE INTENTION OR
EXPECTATION THAT SOME OF THOSE PRESENT WILL ENGAGE IN MOTOR
RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE
DRIVING

WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED)

Defendants

draft ORDER

Before sitting, at the High Court of Justice, Birmingham District Registry, Priory Courts, 33 Bull Street, Birmingham, B4 6DS on

Upon the Claimants' application, by an Application Notice dated , for directions and approving service in respect of the Claim Form, the Claimant's Application and the evidence in support by alternative means pursuant to CPR r. 6.15 and r. 6.27

And upon reading the witness statement of Paul Brown dated 07 October 2022 filed in support of this application.

And upon the Claimants confirming that any Order in these proceedings is not intended to prohibit lawful motorsport taking place on private land where planning permission has been granted and such activities take place

And upon hearing Counsel for the Claimant at a hearing without notice to the Defendants

And upon it appearing to the court that there is good reason to authorise service by a method or place not otherwise permitted by CPR Part 6

IT IS ORDERED THAT

Definitions

1 In this Order the following definitions have been applied:

(1) "the Documents"

- (a) Notice of Hearing and a sealed copy of this Order
- (b) Part 8 Claim Form;
- (c) Particulars of Claim
- (d) N16A application for an Injunction;
- (e) Draft Injunction Order
- (f) Draft Power of Arrest

(2) "the Evidence" materials set out at Schedule A below

(3) "the Claimants' contact details":

FAO: Black Country Car Cruise

Legal Services
Wolverhampton City Council
Civic Centre
St Peters Square
Wolverhampton
WV1 1RG
E: litigation@wolverhampton.gov.uk
T: 01902 556556
DX: 744350 Wolverhampton 27
Ref: LIT/AS/LIJ017753P

Directions for Service

2 Pursuant to CPR r. 6.15 & r. 6.27 the Claimant has permission to serve the Documents and the Evidence on the Defendants by the alternative means set out at paragraphs 2(1) to 2(5) below

- (1) Issuing a media release stating that a High Court Injunction and Power of Arrest have been applied for.

Such release must provide:

- (a) Details of the application and summarise the orders sought;
- (b) The deadline for filing an acknowledgement of service;
- (c) The date, time and location of the hearing of the application;
- (d) The addresses of the dedicated webpages maintained by the Claimants regarding car cruising;
- (e) The Claimants' contact details;
- (f) Details of where and how copies of the Documents and the Evidence may be obtained.

Such release shall be made to, but is not limited to, local print publications including the Express and Star, Chronicle Week, the Birmingham Mail, Halesowen & Dudley News and Stourbridge News; local radio stations including BBC WM, Free Radio, Signal 107, WCR FM and Heart, and BBC Midlands Today and ITV Central.

within three working days of receipt of the sealed order from the court

- (2) Placing on the Claimants' social media including Twitter and Facebook links to the above media release regarding the application to the High Court for an injunction and power of arrest

within three working days of receipt of the sealed order from the court

- (3) Updating the dedicated pages on the websites of Wolverhampton City Council, Dudley Council, Sandwell Council and Walsall Council about the application to the High Court for an injunction and power of arrest

<https://www.wolverhampton.gov.uk/street-racing-injunction>

<https://www.dudley.gov.uk/residents/parking-and-roads/roads-highways-and-pavements/car-cruising-injunction>

https://www.sandwell.gov.uk/info/200284/roads_travel_and_parking/3231/street_racing

https://go.walsall.gov.uk/black_country_car_cruising_injunction

Such pages shall carry a direct link to:

- (a) The Documents;
- (b) The Evidence;
- (c) A Sealed copy of this order.

within four working days of receipt of the sealed order from the court

- (4) Uploading to the video sharing website "You Tube", and the Claimants' websites and social media pages (Twitter and Facebook) a video outlining:
- (a) The nature of the application and summarising the orders sought;
 - (b) The deadline for filing an acknowledgement of service;
 - (c) The date, time and location of the hearing of the application;
 - (d) The Claimant's contact details;
 - (e) The addresses of the dedicated webpages maintained by the Claimants regarding car cruising;
 - (f) Details of where and how copies of the Documents and the Evidence may be obtained.

Items (d) and (e) shall appear on screen as text.

within seven working days of receipt of the sealed order from the court

- (5) Ensuring that copies of the Documents and the Evidence are available at the front desks of the Claimants' main offices.

within three working days of receipt of the sealed order from the court

- 3 The Documents and Evidence shall be deemed served on the Defendants at 23.59 on the date upon which the final step in paragraph 2 has been complied with.

- 4 The Claimants shall file a witness statement confirming that the steps taken to effect service set out at paragraph 2, within 14 days of the final step being taken.

- 5 Any person who wishes to appear at the hearing must file and serve on the Claimants an Acknowledgment of Service no later than 4pm on **18 November 2022**.

- 6 The Claimants' may file any updating evidence by no later than 4pm on **2 December 2022**.

- 7 The matter shall be listed for hearing before a High Court Judge (s.9 if practicable) with a time estimate of 1 day on **[date to be listed by the Honourable Court]** .

- 8 Costs in the case.

SCHEDULE A

Please see Attached Index to Bundle for Injunction Application (Parts B, C, D, E, F and G).

BETWEEN:

- (1) WOLVERHAMPTON CITY COUNCIL**
- (2) DUDLEY METROPOLITAN BOROUGH COUNCIL**
- (3) SANDWELL METROPOLITAN BOROUGH COUNCIL**
- (4) WALSALL METROPOLITAN BOROUGH COUNCIL**

Claimants

-and-

1. PERSONS UNKNOWN WHO PARTICIPATE BETWEEN THE HOURS OF 3:00 P.M. AND 7:00 A.M. IN A GATHERING OF 2 OR MORE PERSONS WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED) AT WHICH SOME OF THOSE PRESENT ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING

2. PERSONS UNKNOWN WHO PARTICIPATE BETWEEN THE HOURS OF 3:00 P.M. AND 7:00 A.M. IN A GATHERING OF 2 OR MORE PERSONS WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED) WITH THE INTENTION OR EXPECTATION THAT SOME OF THOSE PRESENT WILL ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING

3. PERSONS UNKNOWN PROMOTING ORGANISING PUBLICISING (BY ANY MEANS WHATSOEVER) ANY GATHERING BETWEEN THE HOURS OF 3:00 P.M. AND 7:00 A.M. OF 2 OR MORE PERSONS WITH THE INTENTION OR EXPECTATION THAT SOME OF THOSE PRESENT WILL ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED)

Respondents

BUNDLE OF EVIDENCE IN SUPPORT OF APPLICATION FOR AN INJUNCTION

A. SECTION A - STATEMENTS OF CASE

B. SECTION B - Global Overarching Statements

1.	Statement of Adam Sheen 4 October 2022	B 1 - B 3
2.	Overarching Statement of Pardip Nagra (For Wolverhampton) 19 July 2022	B 4 - B 35
3.	EXHIBIT PN1	B 36
4.	Exhibit PN1 - Statement of Lisa Fox (From 2014 Application) 02 11 2013	B 37 - B 40
5.	EXHIBIT PN2	B 41
6.	Exhibit PN2 - Statement of Peter James (From 2014 Application) 09 11 2013	B 42 - B 44
7.	EXHIBIT PN3	B 45
8.	Exhibit PN3 - Statement of Carl Yeomans (From 2014 Application) 07 11 2013	B 46 - B 49
9.	EXHIBIT PN4	B 50
10.	Exhibit PN4 - Statements of David Clark (From 2014 Application) 12 03 2014	B 51 - B 70
11.	EXHIBIT PN5	B 71
12.	Exhibit PN5 - Statement of Lisa Parmar (From 2014 Application) 22 05 2014	B 72 - B 88
13.	EXHIBIT PN6	B 89
14.	Exhibit PN6 - Statement of Lydia Pulford (From 2014 Application) 11 11 2013	B 90 - B 92
15.	EXHIBIT PN7	B 93
16.	Exhibit PN7 Statement of Fanella Bird (From 2014 Application) 23 11 2014	B 94 - B 95
17.	Exhibit PN7 Statement of Fanella Bird (From 2014 Application) 23 11 2014	B 96
18.	EXHIBIT PN8	B 97
19.	Exhibit PN8 - Statement of PC J Hartford (From 2014 Application) 16 11 2013	B 98 - B 99
20.	EXHIBIT PN9	B 100
21.	Exhibit PN9 - Statement of Richard Hardy (From 2014 Application) 06 11 2013	B 101 - B 103
22.	EXHIBIT PN10	B 104
23.	Exhibit PN10 - Statement of Police Inspector Julie Mason (From 2014 Application) 23 07 2014	B 105 - B 109
24.	EXHIBIT PN11 - (Video Footage Available Separately)	B 110
25.	EXHIBIT PN12	B 111
26.	Exhibit PN12 - E-mail from Lisa Fox 17 April 2021	B 112
27.	EXHIBIT PN13	B 113
28.	Exhibit PN13 - Express & Star Article 12 04 22 direct print from Website	B 114 - B 126
29.	Exhibit PN13 Print Friendly Version of E & S Article 12 04 2022	B 127 - B 129
30.	EXHIBIT PN14	B 130
31.	Exhibit PN14 - Letter from Councillor Leach to Wolverhampton ASB Team 05 22	B 131
32.	EXHIBIT PN15	B 132
33.	Exhibit PN15 - Letter from Pat McFadden MP 31 05 22	B 133
34.	EXHIBIT PN16	B 134
35.	Exhibit PN16 - Letter From Nicola Richards MP 25 04 22	B 135
36.	EXHIBIT PN17	B 136

37.	Exhibit PN17 - Version 1 Print Friendly Version of story published on E & S Website 15 08 2018	B 137 - B 142
38.	Exhibit PN17 Version 2 print from E & S Website 15 08 2018	B 143 - B 160
39.	EXHIBIT PN18	B 161
40.	Exhibit PN18 - Essex Live Article 5 April 2021 (Print Friendly Version)	B 162 - B 164
41.	Exhibit PN18 - Essex Live News 5 April 2021 - Report of Thurrock Car Meet From Essex News Website	B 165 - B 170
42.	EXHIBIT PN19	B 171
43.	Exhibit PN19 - Media release July 2022	B 172 - B 173
44.	Overarching Statement of Chief Superintendent Ian Green (West Midlands Police) 19 07 22	B 174 - B 176
45.	Overarching Statement of PC Mark Campbell (West Midlands Police) 15 07 22	B 177 - B 213
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47.	EXHIBIT MRC2 - Video Footage (Available Separately)	B 215
48.	EXHIBIT MRC3	B 216
49.	Exhibit MRC3 - Statement of PC Mark Campbell 13 July 2022	B 217 - B 224
50.	Witness Statement of Paul Brown (Communications Manager) (For Wolverhampton)16 September 2022	B 225 - B 227
51.	STREET RACING COMMUNICATIONS PLAN (FINAL VERSION) FOR BUNDLE	B 228 - B 236
52.	Comms Plan Appendix 1	B 237
53.	Comms Plan - APPENDIX 1	B 238 - B 239
54.	Comms Plan Appendix 2	B 240
55.	Comms Plan - APPENDIX 2	B 241 - B 242
56.	Comms Plan Appendix 3	B 243
57.	Comms Plan - APPENDIX 3	B 244 - B 245
58.	Comms Plan Appendix 4	B 246
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60.	Comms Plan Appendix 5	B 249
61.	Comms Plan - APPENDIX 5	B 250 - B 251
62.	Comms Plan Appendix 6	B 252
63.	Comms Plan - APPENDIX 6	B 253
64.	Comms Plan Appendix 7	B 254
65.	Comms Plan - APPENDIX 7	B 255 - B 257
66.	Comms Plan Appendix 8	B 258
67.	Comms Plan - APPENDIX 8	B 259 - B 260
68.	Comms Plan Appendix 9	B 261
69.	Comms Plan - APPENDIX 9	B 262 - B 264
70.	Comms Plan Appendix 10	B 265
71.	Comms Plan - APPENDIX 10	B 266 - B 267
72.	Comms Plan Appendix 11	B 268
73.	Comms Plan - APPENDIX 11	B 269 - B 270

74.	Comms Plan Appendix 12	B 271
75.	Comms Plan - APPENDIX 12	B 272 - B 273
76.	Comms Plan Appendix 13 -	B 274
77.	Comms Plan - APPENDIX 13	B 275 - B 276
78.	Comms Plan Appendix 14	B 277
79.	Comms Plan - APPENDIX 14	B 278 - B 279
80.	Comms Plan Appendix 15	B 280
81.	Comms Plan - APPENDIX 15	B 281 - B 282
82.	Comms Plan Appendix: "Digital Signage"	B 283
83.	Comms Plan - APPENDIX DIGITAL SIGNAGE	B 284 - B 288
84.	Comms Plan Appendix "Signage 1"	B 289
85.	Comms Plan - Appendix signage 1 - Dudley Existing Signs	B 290
86.	Comms Plan Appendix "Signage 2"	B 291
87.	Comms Plan - Appendix signage 2 - Dudley Existing and Proposed Signs	B 292 - B 295
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89.	Comms Plan - Appendix Signage 3	B 297 - B 299
90.	Comms Plan Appendix "Signage 4"	B 300
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95.	Comms Plan Appendix "Signage 7"	B 307
96.	Comms Plan - Appendix signage 7 - Wolverhampton Existing Signs	B 308 - B 317
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C. SECTIONC- Overarching Statements of Professionals for Each Claimant Local Authority

1.	Statement of Kathryn Jones 13 07 22 (For Dudley)	C 1 - C 5
2.	Witness Statement of Pardip Sandhu 27 September 2022	C 6 - C 12
3.	Exhibit Cover - Exhibit PS1 (Pardip Sandhu 27.9.2022)	C 13
4.	Exhibi PS1 To Statement of Pardip Sandhu 2022 car crusing incidents 2021 - 2022 with date of incidents	C 14 - C 36
5.	Exhibit Cover - Exhibit PS2 (Pardip Sandhu 27.9.2022)	C 37
6.	Statement of Steve Gittins 08 09 22 (For Walsall)	C 38 - C 44
7.	Exhibit Cover SJG1	C 45
8.	Exhibit SJG1 [Steve Gittins] (For Walsall)	C 46
9.	Exhibit Cover SJG2	C 47
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13.	Statement of Police Sergeant Lee Plant 15 07 22 (For Wolverhampton)	C 52 - C 53
14.	(MG11 Format) Police Sergeant Lee Plant Street racing - Wolverhampton	C 54 - C 74
15.	Statement of Police Constable Jonathan Edwards 12 05 22 (For Dudley)	C 75 - C 86
16.	Statement of Police Sergeant Richard Phillips 29 06 22 (For Sandwell)	C 87 - C 90
17.	Statement Police Inspector Phil Upton 09 06 22 (For Walsall)	C 91 - C 93
18.	Second Statement of Police Inspector Phil Upton 04 09 22 (For Walsall)	C 94 - C 104

D. SECTION D - Statements of Councillors, MPs, Residents and Business for Wolverhampton

1.	Witness Statement of Dharminder Dhaliwal (Wolverhampton) Tier 3	D 1 - D 2
2.	Witness Statement of Margaret Clemson (Wolverhampton) Tier 3	D 3 - D 4
3.	Witness Statement of Nicki Wellings (Wolverhampton) Tier 3	D 5
4.	Witness Statement of Taylor Harvey-Beardsmore (Wolverhampton) Tier 3	D 6
5.	Witness Statement of Teja Sidhu (Wolverhampton) Tier 3	D 7
6.	Witness Statement of Teresa Welburn (Wolverhampton) Tier 3	D 8
7.	Witness statement of Jennifer Bateman 26.05.22 (For Wolverhampton)	D 9 - D 12

E. SECTION E- Statements of Councillors, MPs, Residents and Business for Dudley

1.	Signed statement of James Morris MP (For Dudley)	E 1 - E 6
2.	Statement of Stacy Hewerdine - Waterfront Security 10-05-22 (For Dudley)	E 7 - E 12
3.	Exhibit Cover - EXHIBIT SH1 [Stacy Hewedine] (For Dudley) (Clearer Version of Exhibit SH1)	E 13
4.	EXHIBIT SH1 (Waterfront Car Park) [Stacy Hewerdine] (For Dudley) (Clearer Version)	E 14
5.	Signed statement of Richard Hubbard- Harris - Showcase 10-05-22 (For Dudley)	E 15 - E 22
6.	Exhibit Cover RHH1 [Richard Hubbard-Harris] (For Dudley) (Clearer Version of Exhibit RHH1)	E 23
7.	EXHIBIT RHH1 Car Park (Showcase Cinema, Dudley) [Richard Hubbard-Harris] (For Dudley) (Clearer Version)	E 24
8.	EXHIBIT RHH1 Front Car Park (Showcase Cinema, Dudley) [Richard Hubbard-Harris] (For Dudley) (Clearer Version)	E 25
9.	EXHIBIT RHH1 Rear Car Park (Showcase Cinema, Dudley) [Richard Hubbard-Harris] (For Dudley) (Clearer Version)	E 26
10.	Signed 2nd stmt of Richard Hubbard-Harris dated 14-09-22	E 27 - E 33
11.	Exhibit RHH2 - (Video Footage Available Separately)	E 34
12.	Exhibit RHH3 - Cover Sheet	E 35
13.	EXHIBIT RHH3	E 36 - E 40
14.	Exhibit RHH4 - Cover Sheet	E 41
15.	EXHIBIT RHH4	E 42
16.	Exhibit RHH5 - Cover Sheet	E 43
17.	EXHIBIT RHH5	E 44
18.	Exhibit RHH6 - Cover Sheet	E 45
19.	EXHIBIT RHH6	E 46 - E 47

20.	Exhibit RHH7- Cover Sheet	E 48
21.	EXHIBIT RHH7	E 49
22.	Exhibit RHH8 - Cover Sheet	E 50
23.	EXHIBIT RHH8	E 51
24.	Signed statement of John Slater-Kiernan - Shell Garage 11-05-22 (For Dudley)	E 52 - E 56
25.	Exhibit Cover JSK1 [John Slater-Kiernan] (For Dudley)	E 57
26.	Statement of Chris Southall - Tesco 11-05-22 (For Dudley)	E 58 - E 62

F. SECTION F - Statements of Councillors, MPs, Residents and Business for Sandwell

1.	Letter from Nicola Richards MP 25 04 22	F 1
2.	Witness Statement of Donata Halasa (Sandwell) 10 06 22	F 2 - F 3
3.	Witness Statement of John Gallagher (Sandwell) 31 05 22	F 4 - F 5
4.	Witness Statement of Nicki Wellings (Wolverhampton) 11 06 22	F 6
5.	Witness Statement of Ronald Hill (Sandwell) 31 05 22	F 7
6.	Witness Statemet of Sheila Powell (Sandwell) 10 06 22	F 8 - F 9

G. SECTION G - Statements of Councillors, MPs, Residents and Business for Walsall

1.	Witness Statement of Simon Pearson (Walsall) 28 04 22	G 1 - G 2
2.	Witness Statement of Kelly Matthews (Walsall) 28 04 22	G 3 - G 4
3.	Witness Statement of Julia Westwood (Walsall) 13 05 2022	G 5 - G 6
4.	Witness Statement of Lee Roden (Walsall) 21 05 2022	G 7 - G 8
5.	Witness Statement of Robert Norton (Walsall) 22 05 2022	G 9 - G 10
6.	Witness Statement of Ravdeep Khara (Walsall) 24 05 2022	G 11 - G 12

For: Claimants
Statement of: Paul
Brown
Statement no: 1
Exhibits: None.
Date: 07 October 2022

**IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION**

CLAIM NO:

BETWEEN:

**(1) WOLVERHAMPTON CITY COUNCIL
(2) DUDLEY METROPOLITAN BOROUGH COUNCIL
(3) SANDWELL METROPOLITAN BOROUGH COUNCIL
(4) WALSALL METROPOLITAN BOROUGH COUNCIL**

Claimants

-and-

1. PERSONS UNKNOWN WHO PARTICIPATE BETWEEN THE HOURS OF 3:00PM AND 7:00AM IN A GATHERING OF 2 OR MORE PERSONS WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED) AT WHICH SOME OF THOSE PRESENT ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING

2 PERSONS UNKNOWN WHO PARTICIPATE BETWEEN THE HOURS OF 3:00PM AND 7:00AM IN A GATHERING OF 2 OR MORE PERSONS WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED) WITH THE INTENTION OR EXPECTATION THAT SOME OF THOSE PRESENT WILL ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING

3. PERSONS UNKNOWN PROMOTING ORGANISING PUBLICISING (BY ANY MEANS WHATSOEVER) ANY GATHERING BETWEEN THE HOURS OF 3:00PM AND 7:00AM OF 2 OR MORE PERSONS WITH THE INTENTION OR EXPECTATION THAT SOME OF THOSE PRESENT WILL ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING

WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED)

Defendants

WITNESS STATEMENT OF PAUL BROWN

I, PAUL STEVEN BROWN, Communications Manager, Wolverhampton City Council, Civic Centre, St Peter's Square, Wolverhampton, WV1 1RG WILL SAY AS FOLLOWS:

1. Except where indicated to the contrary, the facts in this statement are within my knowledge and are true. Where the facts in this statement are not within my direct knowledge, they are based on the source indicated and are true to the best of my information and belief.
2. Further to my previous statement which I understand appears at page B225 et seq. of the bundle of the documents which the Claimants will file and serve in support of their application for an injunction to restrain street racing, dangerous driving and associated activities within the Black Country area, and in collaboration with my colleagues Pardip Nagra (ASB Team Leader) and Adam Sheen (Senior Solicitor, Legal Services), a Communications Plan has been developed which details the steps which the applicants propose are to be taken to bring notice of the application for an injunction to the attention of "persons unknown" engaging in street racing, dangerous driving and associated activities, members of the public and to any persons that may be affected by the application within the Black Country Area. This communications plan appears as an exhibit to my previous statement in this application.
3. This statement deals with "general communication" – that is, the proposed steps to be taken in the spheres of traditional media, social media and signage, in respect of the application to prohibit street racing.
4. I am aware that the Four Black Country Borough Councils (Dudley, Sandwell, Walsall and Wolverhampton) intend to apply to the honourable court for permission to serve notice of the application for an injunction to restrain street racing and related activities in the Black Country by alternative means of service. Essentially, by undertaking a carefully orchestrated publicity campaign (as planned in detail in the Communications Plan exhibited to my previous

statement in this matter) the Claimants will respectfully contend that fulfilling the steps in the publicity campaign (as set out in the Communications Plan exhibited to my previous statement), this brings adequate notice of the intended injunction application to the attention of Persons Unknown who may be affected by the Injunction (in essence such persons who may fall within one of the three categories of "Persons Unknown" Defendant cited in the headings to this witness statement). On the back of this campaign, I understand the Claimants will argue any "person unknown" who may wish to become involved in these proceedings has adequate and ample opportunity.

5. I am aware that on that premise, the Claimants will respectfully invite the court to dispense with the requirements to serve this application on Persons Unknown personally, something which I understand is normally the requirement for applications for injunctions. I further understand the essence of the Claimants' respectful contentions in this regard will be that the Communications Plan not only more than brings notice of the application to the attention of Persons Unknown, but that personal service of the same on Persons Unknown would be impracticable in any event.
6. I understand that in support of their application for alternative service of the notice of their injunction application, the Claimants must set out a detailed set of steps that they must fulfill in order to have brought notice of the application to the attention of Persons Unknown adequately. These steps must be clearly and precisely defined and set out minimal requirements which must be evidenced as clearly fulfilled in order to have adequately brought notice of the application to the attention of Persons Unknown to fulfil the requirements of having served notice of the application by alternative means.
7. Essentially, in considering and setting requisite steps to be fulfilled to bring notice of the application for injunction to the attention of Persons Unknown who may be affected by the injunction if the honourable court is minded to grant the same, it was necessary to devise steps which would likely reach all such persons. The categories of Persons Unknown (as cited as Defendants in the headings to this witness statement) are clearly broadly defined. Methods of

service of this application on persons unknown I felt needed to be necessarily broad to achieve this objective. This I felt, needed to encompass, traditional media (the written press, television and radio), and social media. It was also necessary that steps were devised to bring notice of the application to any Person Unknown with literacy difficulties adequately. That is why, for example, I understand the Claimants are keen that there be YouTube videos of details of the application, the draft injunction before the Court and details of any hearing being read out together with details of how people can apply to become parties to the injunction application and so forth if they are so minded.

8. The Communications Plan is based on a minimum set of steps the Claimants say they need to fulfil to bring notice of the application for injunction to the attention of Persons Unknown. The Plan itself necessarily goes "over and above" these minimum steps to ensure that when all steps are complete more than adequate service of notice of this application on Persons Unknown has been effected. Whilst the Communications Plan sets out more than the minimum steps the Claimants will contend the following minimum steps are required.

a. Issuing a media release stating that a High Court Injunction and Power of Arrest have been applied for.

Such release must provide:

- i. Details of the application and summarise the orders sought;
- ii. The deadline for filing an acknowledgement of service;
- iii. The date, time and location of the hearing of the application;
- iv. The addresses of the dedicated webpages maintained by the Claimants regarding car cruising;
- v. The Claimants' contact details;
- vi. Details of where and how copies of the Documents and the Evidence may be obtained.

Such release shall be made to, but is not limited to, local print publications including the ~~Express and Star~~ Chronicle Week, the Birmingham Mail, Halesowen & Dudley News and Stourbridge News; local radio stations

including BBC WM, Free Radio, Signal 107, WCR FM and Heart, and BBC Midlands Today and ITV Central.

I confirm the Claimants have set themselves a deadline for this being within three working days of receipt of the sealed order from the court

- b. Placing on the Claimants' social media including Twitter and Facebook links to the above media release regarding the application to the High Court for an injunction and power of arrest

I confirm the Claimants have set themselves a deadline for this being within three working days of receipt of the sealed order from the court

- c. Updating the dedicated pages on the websites of Wolverhampton City Council, Dudley Council, Sandwell Council and Walsall Council about the application to the High Court for an injunction and power of arrest

<https://www.wolverhampton.gov.uk/street-racing-injunction>

<https://www.dudley.gov.uk/residents/parking-and-roads/roads-highways-and-pavements/car-cruising-injunction>

https://www.sandwell.gov.uk/info/200284/roads_travel_and_parking/3231/street_racing

https://go.walsall.gov.uk/black_country_car_cruising_injunction

Such pages shall carry a direct link to:

- i. The Documents;
- ii. The Evidence;
- iii. A Sealed copy of this order.

I confirm the Claimants have set themselves a deadline for this being within three working days of receipt of the sealed order from the court

- d. Uploading to the video sharing website "You Tube", and the Claimants' websites and social media pages (Twitter and Facebook) a video outlining:
 - i. The nature of the application and summarising the orders sought;
 - ii. The deadline for filing an acknowledgement of service;
 - iii. The date, time and location of the hearing of the application;
 - iv. The Claimant's contact details;
 - v. The addresses of the dedicated webpages maintained by the Claimants regarding car cruising;

- vi. Details of where and how copies of the Documents and the Evidence may be obtained.

Items (d) and (e) shall appear on screen as text.

I confirm the Claimants have set themselves a deadline for this being within seven working days of receipt of the sealed order from the court

- e. Ensuring that copies of the Documents and the Evidence are available at the front desks of the Claimants' main offices.

I confirm the Claimant have set themselves a deadline for this being within three working days of receipt of the sealed order from the court.

- f. Public notice in the Express & Star detailing the application to the High Court.

I confirm the Claimants have set themselves a deadline for this being within seven working days of receipt of the sealed order from the court.

- 9. I confirm that I will link with my counterparts in each of Dudley, Sandwell and Walsall Metropolitan Borough Councils and West Midlands Police to ensure that the steps above are effected across the entirety of the Black Country.

- 10. As Communications Manager for Wolverhampton City Council, the lead authority in this application, I will take responsibility for ensuring the steps outlined above, and in the communications plan exhibited to my previous statement, are adequately fulfilled. If for any reason I am unable to communicate any of the steps outlined in this statement, a member of the council's communications team will carry out this work in my absence. It is also my intention to monitor progress of the fulfillment of the Communications Plan and steps the honourable court deems necessary to bring notice of this application to the attention of Persons Unknown and make a subsequent statement to be filed within the honourable court at a later date evidencing that all steps required to be fulfilled to serve notice of this application on Persons Unknown have been fulfilled as soon as practicable after completion of those steps.

Statement of Truth

I believe that the facts stated in this witness statement are true. I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

Signed



Date

07 October
2022

Print name in full PAUL STEVEN BROWN

B. SECTION B - Global Overarching Statements

**IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION**

CLAIM NO:

BETWEEN:

- (1) WOLVERHAMPTON CITY COUNCIL**
- (2) DUDLEY METROPOLITAN BOROUGH COUNCIL**
- (3) SANDWELL METROPOLITAN BOROUGH COUNCIL**
- (4) WALSALL METROPOLITAN BOROUGH COUNCIL**

Claimants

-and-

1. PERSONS UNKNOWN WHO PARTICIPATE BETWEEN THE HOURS OF 3:00 P.M. AND 7:00 A.M. IN A GATHERING OF 2 OR MORE PERSONS WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED) AT WHICH SOME OF THOSE PRESENT ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING

2. PERSONS UNKNOWN WHO PARTICIPATE BETWEEN THE HOURS OF 3:00 P.M. AND 7:00 A.M. IN A GATHERING OF 2 OR MORE PERSONS WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED) WITH THE INTENTION OR EXPECTATION THAT SOME OF THOSE PRESENT WILL ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING

3. PERSONS UNKNOWN PROMOTING ORGANISING PUBLICISING (BY ANY MEANS WHATSOEVER) ANY GATHERING BETWEEN THE HOURS OF 3:00 P.M. AND 7:00 A.M. OF 2 OR MORE PERSONS WITH THE INTENTION OR EXPECTATION THAT SOME OF THOSE PRESENT WILL ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED)

Respondents

WITNESS STATEMENT OF ADAM SHEEN

1. My name is Adam James Richard Sheen. I am a practising Solicitor-Advocate (Civil and Criminal) employed by Wolverhampton City Council within the Litigation Team of the Council's Legal Services Team. I qualified as a solicitor in September 2005 and gained my Higher Courts (Civil Advocacy) and Higher Courts (Criminal Advocacy) qualifications in 2013 and 2014 respectively. I have been employed by Wolverhampton City Council Legal Services since February 2007.
2. My role comprises, amongst other things, advising and representing various departments of the Council, and its arm's length management organisation, in a broad array of litigious matters. A particular focus of my work concerns litigation involving seeking legal remedies to tackle alleged anti-social behaviour.
3. I make this statement from my own knowledge, except where otherwise stated, and after considering relevant information held by the Claimants, as well as making all due and proper enquiries of the Claimants' employees, servants or agents.
4. I am the solicitor with day-to-day conduct of a joint application brought by Wolverhampton City Council, Dudley Metropolitan Borough Council, Sandwell Metropolitan Borough Council and Walsall Metropolitan Borough Council (together referred to as the "Black Country Councils"), for injunctive relief to restrain the activities of street racing and associated dangerous driving activities within the entirety of the combined local government area for which the Black Country Borough Councils are jointly responsible.
5. Many of the witness statements included in the bundle of documents supporting this application were obtained before the death of Her Majesty Queen Elizabeth II on 08 September 2022 and hence these statements were made under the heading "in the High Court of Justice Queen's Bench Division". Notwithstanding the immediate change in the title of the Queen's Bench Division to the King's Bench Division on the death of Her Majesty, and the death of Her Majesty occurring prior to this action being commenced by issuing the same at court, the Claimants will respectfully contend any reference within the witness statements to the "High Court of Justice Queen's Bench Division" should henceforth be read as in the "High Court of Justice King's Bench Division".
6. In a similar vein to paragraph 5 above, I note that many of the witness statements included in the bundle of documents supporting the Claimants' application for injunctive relief were taken before the action title (and descriptions of the proposed *persons unknown* were finalised) which is why such statements simply bear the description "Persons Unknown". The Claimants will thus respectfully contend any reference within the witness statements to "Persons Unknown", or "Persons Unknown Engaging in Dangerous Driving and Associated Activities". should henceforth be read as:

“1. PERSONS UNKNOWN WHO PARTICIPATE BETWEEN THE HOURS OF 3:00 P.M. AND 7:00 A.M. IN A GATHERING OF 2 OR MORE PERSONS WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED) AT WHICH SOME OF THOSE PRESENT ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING

2. PERSONS UNKNOWN WHO PARTICIPATE BETWEEN THE HOURS OF 3:00 P.M. AND 7:00 A.M. IN A GATHERING OF 2 OR MORE PERSONS WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED) WITH THE INTENTION OR EXPECTATION THAT SOME OF THOSE PRESENT WILL ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING

3. PERSONS UNKNOWN PROMOTING ORGANISING PUBLICISING (BY ANY MEANS WHATSOEVER) ANY GATHERING BETWEEN THE HOURS OF 3:00 P.M. AND 7:00 A.M. OF 2 OR MORE PERSONS WITH THE INTENTION OR EXPECTATION THAT SOME OF THOSE PRESENT WILL ENGAGE IN MOTOR RACING OR MOTOR STUNTS OR OTHER DANGEROUS OR OBSTRUCTIVE DRIVING WITHIN THE BLACK COUNTRY AREA SHOWN ON PLAN A (ATTACHED)”.

Statement of Truth

I believe that the facts stated in this witness statement are true. I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

Signed



Date

04 October 2022

Print name in full ADAM JAMES RICHARD SHEEN

i) Statement of: Pardip Nagra
ii) Statement No: 1
iii) For: Claimants
iv) Dated: 19 July 2022
v) Exhibits: PN1-PN19

**IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION**

CLAIM NO:

B E T W E E N:

**(1) WOLVERHAMPTON CITY COUNCIL
(2) DUDLEY METROPOLITAN BOROUGH COUNCIL
(3) SANDWELL METROPOLITAN BOROUGH COUNCIL
(4) WALSALL METROPOLITAN BOROUGH COUNCIL**

Claimants

and

PERSONS UNKNOWN

Respondents

WITNESS STATEMENT OF PARDIP NAGRA

I, Pardip Nagra, on behalf of Wolverhampton City Council, WILL SAY AS FOLLOWS:

1. I am Pardip Nagra and I am employed as Team Leader for Wolverhampton Anti-social Behaviour Team (ASBT), employed by Wolverhampton Homes. I have held this position since April 2013.
2. This injunction application is a joint enterprise and, so far as I make representations on matters solely affecting the other local authority areas of Dudley, Sandwell and Walsall, I confirm I have discussed these representations with my counterparts in the other authorities and they have confirmed the same as accurate.

Background to previous injunction granted which was in place from 2 February 2015 to 1 February 2021

3. I am aware of proceedings in relation to an injunction application that was made to the High Court in 2014 which saw the four Black Country Councils (Dudley, Sandwell, Walsall and Wolverhampton) seeking an injunction to prevent “car cruising” across the four local authority areas. The previous injunction was granted by His Honour Judge Owen QC, sitting as a high court judge, on 1 December 2014 and came into force on 2 February 2015. An application to extend the injunction for a further three years was granted on 9 January 2018 by His Honour Judge McKenna. The injunction lapsed on 1 February 2021. My former colleague and line manager, Joanne Mason, was the co-ordinating officer for the preparation and collation of evidence across the four areas.

4. In 2014, adopting the terminology from other injunctions restraining car cruising, His Honour Judge Owen QC explained “car cruising” as:

“Car cruises are ... in essence... events [which] attract the drivers of cars, including what are colloquially known as ‘Boy Racers’ who show off to crowds of ‘car cruise’ supporters by racing their cars and performing driving stunts and timed trials. The vehicles that are used include high performance cars and cars which have been modified in terms of their power. The activities in which drivers engage are noisy, dangerous and illegal, obstructing highways and the premises bordering them, damaging property and putting spectators or other road users at risk of injury or worse. They attract those to whom such anti-social behaviour is an excuse, if they need one, for other types of anti-social behaviour, including the harassment and intimidation of law abiding citizens, the threatening and abuse of those who challenge them and the activities in which they are engaging, the use of foul language and the misuse of drugs. By its very nature, those attending car cruising events, whether as drivers, passengers or spectators, will vary from day-to-day and event-to-event. However, the total number of attendees will regularly run into several hundred people. They are attracted by advertising on the internet and in magazines as well as word of mouth.

5. As described in the evidence presented to the court in 2014 at the original injunction application hearing, car cruising had been a regular bone of contention with local residents, motorists and businesses in areas in the Black Country for many years.

6. From the evidence gathered for the 2015 injunction application, Joanne Mason noted that the activity of car cruising is noisy, dangerous and illegal, obstructing highways and the premises bordering them, damaging property and puts spectators or other road users at risk of injury or worse. The noise of revving engines, car horns, racing cars and spectators frequently disturbs local residents who are trying to sleep as well as those conducting commercial business.
7. Huge numbers of spectators gather to watch the car cruising and children are often present amongst these spectator groups. Rowdy behaviour, shouting, foul language, criminal damage and littering are often a by-product of the car cruises.
8. As outlined in the evidence presented to the High Court in 2014, in the Black Country area these gatherings involved a large number of car cruisers who regularly raced their vehicles along the Black Country Route and Black Country New Road as well as other roads and areas in Dudley, Walsall, Sandwell, and Wolverhampton. The activity typically occurred on Sunday evenings and, on occasions, as many as 250 vehicles were witnessed participating in these car cruises with huge crowds of spectators lining 'the route'.
9. During 2013 and 2014, Joanne Mason was provided with over 100 witness statements from members of the public who were complaining about the car cruising. These witness statements were provided to the court with the bundle of documents filed in support of the application in 2014 for an injunction to prevent car cruising in the Black Country area.
10. I do not intend to trouble the court to read through all the original 2013/14 statements; instead, in this statement I will make reference to a small sample of witness statements in order to provide the Honourable Judge with some context as to the nature and scale of the car cruising issue that led to the original application to the High Court in 2014. Outlined below is a summary of the negative impact car cruising was having on residents living in the affected areas prior to the original injunction being granted in 2014. Also detailed below is the impact the activity was having on police resources at the time.

Victim impact on residents; noise/sleep deprivation, harassment, fear, intimidation, nuisance, obstruction, dangerous driving and risk of harm prior to 2015 injunction

Noise/sleep deprivation

11. From the large number of witness statements provided by members of the public during 2013 and 2014, it was clear that car cruising activity was having a significant detrimental impact on local residents. Residents were continually subjected to loud levels of noise nuisance from engines (that had often been modified resulting in increased noise levels) being revved, cars being raced around as well as loud music from car stereos and shouting from spectators who lined the route.
12. Prior to the previous injunction coming into force in February 2015, it was reported that car cruising activity often started on Sunday evenings and went on until the early hours of Monday mornings. Many residents reported sleep deprivation because of the noise which they said impacted on their performance at work the following day.
13. During 2013/14 in Walsall:
 - In their witness statements, residents in the Brickyard Lane area of Walsall complained about the noise from revving of engines, loud music and shouting by the car cruisers and spectators which disturbed residents' sleep and detrimentally impacted on their quality of life.
 - Residents living in Walsall town centre reported noise from gatherings of car cruisers on Tesco car park. The residents complained of disturbed sleep from the screeching tyres, speeding vehicles and loud music.
 - In the Moxley area, residents regularly complained about the car cruisers who congregated on the Aldi car park. Residents living nearby stated that the revving of engines and cars being raced disturbed their sleep.
 - Residents reported large gatherings of vehicles on the Maybrook industrial estate in Walsall which proceeded to race each other along Brownhills Road. They complained about the noise of revving engines, screeching tyres, vehicles backfiring, all of which resulted in residents not being able to sleep because of the noise.

14. During 2013/14 in Wolverhampton:
- Residents living in the Sedgemoor Park area of Wolverhampton complained about car cruising along the Black Country route near to their homes. They reported high levels of noise which deprived them and their families of sleep.
 - One witness, Lisa Fox, stated that it caused articles within her house to shake and vibrate. This information is provided in the witness statement of Lisa Fox (dated 29/7/14) that was filed in the 2014 application for an injunction and which is provided as **Exhibit PN1**.
 - Another witness, Jennifer Bateman, who lives in the Sedgemoor Park area told Joanne Mason that she went away almost every weekend, returning to her home on a Monday; she did this solely to escape from the noise because she knew she would not get any sleep if she stayed in her home. She reiterated this to my colleague Sarah White, who has since left the Wolverhampton Homes organisation, when she spoke to her for an updated statement in May 2022, with her advising that this was why she so strongly supported the re-application for an injunction.

Harassment, intimidation, fear and nuisance

15. Prior to the High Court granting the previous injunction, in 2013/2014 several members of the public complained about harassment and intimidation from drivers, passengers and spectators involved in car cruiser gatherings.
16. These reports included incidents in Sandwell where members of the public had been shouted at, sworn at, and on one occasion a passenger in one of the vehicles pulled his trousers down and exposed himself to passers-by. This particular incident is detailed in the witness statement of Peter James (dated 09/11/2013) paragraph 5, which is provided as **Exhibit PN2**.
17. On another occasion in 2013, residents of Brickyard Lane in Walsall reported they attempted to take the registration numbers of vehicles involved but were met with verbal abuse from the car cruisers. Details of this incident can be found in the witness statement of Carl Yeomans (dated 07/11/2013), paragraph 4 which is provided as **Exhibit PN3**.
18. As described in a witness statement of David Clarke, Health and Safety Co-ordinator of Johnson Controls (now called Adient), members of staff who were merely attempting to access their place of work, were subjected to verbal abuse – including derogatory sexual

comments to female employees – by ‘car cruisers’ obstructing access in and out of the plant. These incidents are detailed in the witness statement of David Clark (dated 12 March) paragraph 14, that was filed in the 2014 application for an injunction and is provided within **Exhibit PN4**.

Obstruction, dangerous driving and risk of harm

19. In 2013/2014, witnesses reported car cruisers approaching an island by Hallens Drive, Wednesbury driving at 60-70 mph. At that time residents and businesses reported that on Sunday evenings, Hallens Drive and surrounding roads were turned into a ‘race track’ by those involved in car cruising. It was said that the car cruisers sometimes used spray paint to write the word “START” on the highway.
20. On 18 May 2014, an officer from Wolverhampton City Council was travelling on her way to work when she noticed several markings on the road in Hallens Drive, Wednesbury, indicating the road had been used as a ‘race track’ the previous evening (Sunday). This Council employee, Lisa Parmar, provided a statement detailing what she had witnessed which is provided as **Exhibit PN5**.
21. In 2013/2014, members of the public reported car cruisers driving in convoy around a roundabout, doing several laps, and thus obstructing other drivers from accessing the roundabout. One witness reported approximately 25 cars doing this, each car carrying 3-4 people, all of whom were laughing at the chaos they were causing. This same witness reported one occupant of a vehicle pouring liquid onto the road surface from a passenger door, presumably to make the cars skid better. These particular incidents are detailed in the witness statement of Peter James (dated 09/11/2013) paragraph 2 – 4, which is provided as **Exhibit PN2**.
22. During 2013/2014, complaints were also being regularly received from local businesses about car cruising. The witness statements of David Clark, Health and Safety Co-ordinator of Johnson Controls (now called Adient) - one of the largest employers in Wednesbury (Sandwell) – detailed car cruisers obstructing access in and out of the plant, verbal abuse towards staff, and criminal damage to delivery vehicles. Not only did car cruising impact on production deadlines at Johnson Controls, because of the chemicals used in the production processes, it also posed a significant and wide-reaching health and safety risk to the general public should there have been a collision between a car cruiser and a delivery vehicle. These incidents are detailed in the two witness statements of David Clark

(dated 12 March 2014 and 17 July 2014) that were filed in the 2014 application for an injunction and are provided as **Exhibit PN4**.

23. In 2013/14, other residents stated they had curtailed their recreational activities. One witness said that she used to enjoy a Sunday evening walk with her partner along the A41 in Wednesbury. However, this stopped when she was shouted at in an aggressive manner by a passenger in one of the “boy racer” convoys. Details of this incident are provided in the witness statement of Lydia Pulford (dated 11/11/2013), paragraphs 5 and 6, which is provided as **Exhibit PN6**.
24. Another witness reported in 2013 how he used to enjoy fishing on Sundays on the canal at Hallens Drive in Wednesbury. However, because of the disruption caused by the car cruisers, including noise, dangerous driving and littering, he had stopped this recreational activity. Details of this matter are provided in the witness statement of Peter James (dated 09/11/13), paragraph 9, which is provided as **Exhibit PN2**.
25. Another witness who provided evidence in 2014, when the previous injunction was being sought, described inadvertently getting caught up in car cruising activity and having to pull her car over into SMA Car Auctions on the Black Country Route in Wolverhampton to escape. She described herself as “physically shaking and petrified from this experience which was frightening and horrid”. In her statement, she goes on to state; “This was a terrible experience which I do not want to go through again. I have been driving for 25 years and have never seen an incident like this before.” This information is provided in the witness statement of Fenella Bird (dated 23 November 2014) that was filed in the 2014 application for an injunction and is provided as **Exhibit PN7**.
26. In addition, several police officers provided witness statements to support the previous application. For example, on 10 March 2013 two cars were involved in a collision at Springvale Retail Park, Bilston, Wolverhampton; it was suspected that these cars had been involved in a street race that evening. This incident is detailed in the witness statement provided by PC Jonathon Harford, dated 16 November 2013 and is provided as **Exhibit PN8**.

Environmental impact, damage to businesses and economic loss to businesses prior to 2015 injunction

27. Prior to the 2015 injunction businesses in the Hallens Drive area of Wednesbury reported large volumes of litter left by the car cruisers and spectators which had a huge detrimental impact on the area.
28. As well as littering, residents and businesses in Brickyard Lane, Aldridge, reported those attending had been urinating in the porches of buildings, causing damage to buildings and fences, oil spillages and left behind debris from crashed vehicles. Cleaning of the surrounding area was a very costly exercise. Businesses in the Brickyard Lane area were paying thousands of pounds in repair bills, and they had also seen their insurance premiums increase significantly. The cost of replacing a crash barrier for one company in Brickyard Lane was £600. Prior to the 2015 injunction, car cruising was having a serious detrimental impact on business operations in the Brickyard Lane area. Details relating to this matter are explained in the witness statement of Richard Hardy (dated 06/11/2013) paragraph 13, which is provided as **Exhibit PN9**.
29. As outlined in paragraph 22, a company that operates in Hallens Drive is Adient (formerly Johnsons Controls) which is a multi-national company and one of the largest employers in Sandwell Borough. The plant operates 24 hours per day, 7 days per week. Prior to the 2015 injunction, most Sunday evenings, the Hallens Drive area of Wednesbury was 'transformed' into a 'race track' by car cruisers, with roads and gates to sites completely blocked. Because delivery vehicles were unable to get in and out of the plant, this caused significant delays to the production process; the consequence was that production deadlines were often missed which was costing the company money. Detail on this matter is contained in the witness statement of David Clark (dated 12/3/14), paragraph 17, which is provided as **Exhibit PN4**.
30. Other nearby business operations in the Hallens Drive area, for example Warburtons Bakery and the Ring and Ride service, were experiencing the same issues that were severely hampering their ability to run their operations. Witness statements to this effect were provided by employees of Warburtons and Ring and Ride in the application for the 2015 injunction.

Impact on police resources prior to 2015 injunction

31. At the injunction hearing in 2014, Inspector Julie Mason of West Midlands Police (now retired) provided a summary dealing with criminal behaviour and the impact the ongoing issue of car cruising was having on police resources, on medical resources and accident and emergency services. Inspector Mason's statement is provided as **Exhibit PN10**.

Evidence of effectiveness of the previous injunction prohibiting car cruising in the Black Country area (2 February 2015 to 1 February 2021) and the current situation.

32. Since the previous injunction came into force in February 2015, whilst evidence gathering for annual review hearings, Joanne Mason monitored reaction to the injunction. When speaking to many members of the public they told her that they were hugely relieved that the car cruising injunction was in place and that their quality of life had improved significantly.
33. As stated above, car cruising activity took place across all four of the Black Country local authority areas. I deliberately use the past tense here because since the previous injunction came into force in February 2015, following a carefully orchestrated extensive publicity campaign and effective 'policing' of the affected areas, I can report that on the whole, the injunction had a positive impact across the four Black Country Local Authority areas. The injunction significantly reduced the problem, although car cruising did not stop altogether.
34. In late 2020, prior to the application to renew the previous injunction being made to the High Court, in order to gauge the success of the injunction, Joanne Mason requested witness statements from members of the public and businesses across areas that had experienced problems with car cruisers at the time when the previous injunction was sought in 2014. Joanne also requested updates from the local authority lead officers as well as West Midlands Police. Following Joanne Mason's retirement in January 2022, once an agreement was made to make a new application for an injunction, my former colleague Sarah White also made enquiries with previous and new witnesses.

Wolverhampton

35. In late 2020, two residents living in the Ettingshall/Springvale area of Wolverhampton, who had previously suffered from the anti-social activity of car cruising, reported a significant reduction in car cruising since the injunction came into force.
36. However, in her witness statement, resident Lisa Fox, who lives in the Springvale area of Wolverhampton, stated that for three weeks during July and August 2020 she did see an increase in car cruising in her area; she goes on to state that this had since stopped. I understand the statement of Lisa Fox will be included in the bundle of documents available to the court filed in support of this application.
37. Similarly, in her witness statement, resident Rajbinder Kaur, who also lives in the Springvale area, also reported that since Covid-19 'lockdown' in March 2020, she had noticed there had been times when there had been noise from car cruising. I understand the statement of Rajbinder Kaur will be included in the bundle of documents available to the court filed in support of this application.
38. The most recent incident of car cruising that was subject to committal applications in Wolverhampton was in October 2018, and which concluded in May 2019. Following this incident, additional signage was placed in Springvale Avenue in Wolverhampton.
39. In 2021, Joanne Mason became aware of an incident that took place on 5 July 2020 on the Black Country New Road in Wolverhampton and onto Birmingham New Road towards Dudley. Police traffic officers were aware that car cruisers had gathered for a 'meet' on or near to Springvale Avenue in Wolverhampton. Police traffic officers, who were looking out for dangerous driving in relation to this car cruise 'meet', witnessed two vehicles that appeared to be racing each other.
40. I now refer to **Exhibit PN11** which is video footage recorded by West Midlands Police relating to the incident mentioned in paragraph 39 above. I now describe what can be seen on the footage.
 - At sixteen seconds into the footage, it appears that two cars are racing each other along the Black Country Route/New Road; the police go in pursuit of the vehicles.
 - At thirty-six seconds into the footage, cars can be seen parked on the side of the road at the traffic island.

- During the pursuit, the police vehicle was travelling at 109 miles per hour trying to keep up with a Vauxhall Corsa when the driver refused to stop.
- Whilst being driven at high speed along Birmingham New Road, at one minute and thirty-four seconds into the footage, the Corsa can be seen veering across the dual carriageway and onto the wrong side of the road where it continued for a third of a mile.
- At one minute and thirty-eight seconds into the footage, an innocent driver who is attempting to turn right onto the dual carriageway can be seen to brake sharply to avoid a collision with the Corsa being driven on the wrong side of the road
- The Corsa then turns right off the dual carriageway and into a residential side street and continues to travel at high speed. Parked cars can be seen on the right-hand side of the road, meaning there was only enough room for one car to get through. Had another car come from the opposite direction, this may well have resulted in a serious collision.
- A police helicopter was deployed to the incident and was able to guide the police officers to enable them to block the Corsa.
- The driver, Anthony Barnes, was arrested, and it transpired that he only had a provisional driving licence and was not insured to drive the vehicle. Mr Barnes was subsequently charged, convicted, and given a six-month suspended prison sentence and banned from driving for two years.

41. Having viewed the footage of this incident, it is evident that the driving is extremely dangerous to other road users, pedestrians and to the police officers in pursuit. Furthermore, in my professional opinion, the gathering of parked vehicles adjacent to a traffic island in a known 'hotspot' location in the Springvale area of Wolverhampton, together with vehicles racing each other at speed, are the hallmarks of an organised car cruise 'meet'.

42. In August 2020, Councillor Celia Hibbert enquired with City of Wolverhampton Council regarding her concerns about speeding cars and motorbikes racing along the A449 Penn Road from the Rose and Crown pub into South Staffordshire. She provided an email received from a named resident who reported that the vehicles in question are mainly 'supercars' but that motorbikes were also part of the problem. This resident felt there was a pattern emerging, with incidents occurring on Thursdays, Fridays, Saturdays and Sundays, and asked that we imagine the noise being experienced. He called for a co-ordinated response to address this cruising and racing before a major incident occurred.

Joanne Mason then spoke to a different resident who works in the Penn area, who had made a recent report to West Midlands Police about two vehicles being seen pulling off a car park at high speed, driving in convoy.

43. On Saturday 17 April 2021 at 23:43 hours, Joanne Mason received an email from resident Lisa Fox who lives near the Black Country Route in Springvale, Wolverhampton, stating: "Hi Jo. Racing like mad at minute down black country route. Saturday 17th 23.30". On Monday 19 April 2021 at 08:55 hours, Joanne received a further email from Mrs Fox stating: "Hi Jo. They was racing again last night [Sunday 18 April 2021] around midnight.". I exhibit the emails from Mrs Fox as **Exhibit PN12**.
44. In April 2021, Mrs Rachel Fanthom who is an anti-social behaviour officer in Wolverhampton Anti-social Behaviour Team, provided a witness statement relating to an incident of car cruising she had witnessed the previous evening, Saturday 10 April 2021. In her witness statement, Mrs Fanthom describes that at 23:05 hours, as she was travelling from her home to McDonalds restaurant in Bilston, Wolverhampton, she observed groups of vehicles parked up at various locations along the Black Country Route in Springvale, Bilston, revving their engines. Mrs Fanthom states that as she drove along the Black Country Route towards Springvale Avenue, a green Audi came up alongside her and started revving as if they wanted her to race with them. Mrs Fanthom ignored them and continued as normal, so the Audi drove off at speed in front of her onto the roundabout and beyond, out of sight.
45. Mrs Fanthom goes on to describe that on arrival at McDonalds, Bilston, when she tried to place her order the operative struggled to hear what she was saying due to the noise from vehicles parked on the car park. When Mrs Fanthom got to the payment window, the operative apologised for the noise; she told Mrs Fanthom that the noise from the cars was often an issue, but that this evening was particularly bad. Mrs Fanthom states that she then parked up on the car park and observed approximately thirty cars parked on the car park, headlights on, revving engines, some beeping horns and some driving recklessly around the car park. Mrs Fanthom observed that most of the vehicles had some kind of performance specification or modification and that a couple of motorbikes were there also.
46. Upon leaving McDonalds' car park, Mrs Fanthom changed her route to go back home in order to avoid the Black Country Route and risk inadvertently getting caught up in the

vehicles racing. However, she states that even then she could see cars racing each other around the main Bilston roundabout and she could hear cars further down the road too.

47. The location of the incident described by Mrs Fanthom is very near to the home of the witness Jennifer Bateman who, as outlined in paragraph 49 below, has reported a significant increase in noise from car cruising since the previous injunction lapsed on 1 February 2021.
48. On 12 April 2022, the Express & Star online published an article with the headline “Teenage police chase suspect released as investigation into Wolverhampton bike meet continues”. The article reports on an incident in the Bushbury area, where two bikes at an organised meet failed to stop for officers and went on to drive dangerously. One 17 year old suspect was arrested after he crashed into a car. This article is exhibited as **Exhibit PN13**.
49. In May 2022, Sarah White spoke to Jennifer Bateman (referred to initially in paragraph 14), who provided an updated witness statement confirming that car cruising has become a regular weekend event again, notable since the expiry of the last injunction. She said she can hear the noise from the racing cars and their backfiring exhausts. She added that she and her husband had started to feel despondent and that there was little point in making reports due to the nature of the incidents and feasibility of obtaining specific details. She said that she just hopes that no one else is injured or killed and is worried that her life will become unbearable if the injunction is not granted.
50. On 16 May 2022, Sarah White attended a community meeting at Swanmore Community Centre in the Wolverhampton Ward of Merry Hill, to meet local residents and partner agencies to discuss current crime and anti-social behaviour concerns in the Penn & Merry Hill Wards. Two residents living on the A449 Penn Road raised the issue of racing on this road and regular noise nuisance suffered as a result. Councillor Stephanie Haynes was in attendance and echoed that she had received a number of enquiries about this issue, which prompted Sarah to feed back with regards to the current situation and injunction application. Councillor Haynes therefore confirmed that she fully supported this application.

51. In May 2022, Councillor Linda Leach provided a letter in support of a new injunction to tackle car cruising activity. She said that she had received many complaints from concerned residents about car cruising, stating that reports were mainly about residential streets in the Bilston North ward of Wolverhampton, and felt that incidents had risen since the injunction had lapsed. She fully supports an application for a new order. Councillor Leach's letter is exhibited as **Exhibit PN14**.
52. On 25 May 2022, Sarah White spoke to Dalbir Jassal, a driver for 247 Cars, a taxi firm based in Wolverhampton. Sarah advised Mr Jassal that she was aware he had made a call to West Midlands Police recently regarding car cruising or street racing, and that she wished to discuss this further with him. He confirmed that he had made more than one call in the past, due to problems he had experienced whilst at work. He said he could not remember exact dates, but that car cruising was still definitely a current issue and that he had made some calls in 2022, stating that he had seen around 150 cars racing each other on the Black Country Route, by Mecca Bingo and B&Q Store on Springvale Way in Bilston. He said he sees 'boy racers' gathered at the middle of the roundabout on foot, to watch others race, adding that they are usually young boys wearing masks. He said they all have cars with big exhausts and that there can be between 50 and 150 cars at a time, with around 20 to 30 spectators. He said it tends to happen around 9 to 10pm, with them only tending to stay for about 30 minutes before driving off. Mr Jassal said there have been times where he has been unable to complete jobs to pick up customers from Mecca Bingo, due to the obstruction caused by car cruising. He said that it is very much still a problem, and that business for the taxi firm is clearly lost as a result.
53. Also on 25 May 2022, Sarah White spoke to Natasha Williams, a resident living on Oxford Street in Bilston, who recalled contacting West Midlands Police recently in the past year, in response to street racing between the roundabouts near her home. Ms Williams clarified that she was not referring to lone vehicles regularly speeding on a busy road, and she confirmed that she had seen up to ten cars at a time racing each other from one end of the road to the other. She stated that it happens regularly and is usually on a Sunday night, going on until quite late, often stopping once the police are called. She added that there are often times when she has to turn up her television to mask the noise nuisance, and that her young daughter sometimes struggles to get to bed at an appropriate time because of it.

54. On 31 May 2022, Pat McFadden, Member of Parliament for Wolverhampton South East, provided a letter in support of a new application for the injunction, noting that enquiries about this issue mainly stopped when the original injunction came into force. He said that more recently, he had received complaints, mainly from residents living in the Ettingshall Park area of Wolverhampton, that the problem had recurred. He therefore supports a new application, and his letter is exhibited as **Exhibit PN15**.
55. In his witness statement dated 15 June 2022, Police Sergeant Lee Plant of the Bilston Neighbourhood Team notes that the issue of street racing is still very much present across Bilston from Wednesbury through Dudley, and beyond into Staffordshire Police areas such as Coven. He notes that 251 incidents were logged between June 2020 and March 2022 in the Wolverhampton ward areas of Bilston East, Bilston North and Springvale alone, and therefore feels that the injunction is necessary to protect those impacted by the behaviour as well as deter those responsible.

Walsall

56. In late 2020, a Walsall resident, Jeffrey Differ, reported a vast improvement overall in relation to the nuisance of car cruising in the Moxley area. I understand the statement of Jeffrey Differ will be included in the bundle of documents available to the court filed in support of this application.
57. Richard Hardy, who is a director of a business operating in Brickyard Lane, Walsall, reported that since the injunction came into force in 2015, he had seen a significant reduction in vehicle activity in Aldridge, with less noise and less anti-social behaviour. Mr Hardy stated that it has made a difference and he said in his statement that he feared if the injunction were to be removed then the problem may well return to the pre-2015 level of anti-social behaviour and nuisance. I understand the statement of Richard Hardy will be included in the bundle of documents available to the court filed in support of this application.
58. In his witness statement provided in May 2022, Steven Gittins, who is a Team Leader in Walsall Metropolitan Borough Council's Community Protection Team, stated that whilst there are still some problems associated with car cruising across the borough, reports to both the police and council significantly reduced whilst the injunction was in force. Mr Gittins stated that he had recently spoken to a local resident who had noted an improvement whilst the order was in force, but that his current experience was that he

could once again hear cars racing behind his house. He reminded Mr Gittins of his previous experience of 30 plus vehicles racing up and down from 8pm until 2am or 3am and that it made his life intolerable. Mr Gittins also stated that Business owners whose premises are in Brickyard Lane, Aldridge, confirmed that car cruising activity had reduced significantly following the injunction coming into force, but that in December 2021, palisade fencing at their premises was damaged in what appeared to be a vehicle collision, which they believed to be the result of speeding vehicles. They were concerned that associated issues with litter and debris had started to take place again.

59. Mr Gittins also references speaking to a resident in Aldridge who had noted an improvement and feeling of safety whilst the injunction was in force, however now felt that the situation had deteriorated, noting hearing vehicles racing through the centre of Aldridge and along Northgate at weekends and after 10pm. He had also seen cars breaking the speed limit and racing each other at earlier points in the evening whilst walking his dog. Mr Gittins concluded that whilst the frequency of incidents had reduced, there were still areas of concern where a worrying increase had been noted. I understand the statement of Steven Gittins will be included in the bundle of documents available to the court filed in support of this application.
60. In his witness statement dated June 2022, Temporary Inspector Philip Upton states that in relation to Walsall, there have been 282 incidents of street racing reported between April and December 2020, 269 incidents between January and December 2021 and 57 incidents between January and March 2022.

Sandwell

61. In regard to Sandwell, in late 2020, a witness statement provided by David England, who is a representative of business, highlighted that when the injunction had been in place, there had been a significant reduction in car cruising/racing in and around Warburtons Bakery. Mr England stated that he was not aware of any significant gatherings/car cruising meets since he made his last statement for the 2020 injunction review hearing. I understand the statement of David England will be included in the bundle of documents available to the court filed in support of this application.
62. In her witness statement provided in late 2020, Hema Hayer who is a resident living near to the Hallens Drive area of Wednesbury (Sandwell), reported experiencing noise and intimidation by “boy racers” for ten years. Mrs Hayer remained concerned that car cruising

would return to the scale it was before the injunction was granted and she wanted a longer-term solution to address the problem. I understand the statement of Hema Hayer will be included in the bundle of documents available to the court filed in support of this application.

63. In April 2022, Nicola Richards, Member of Parliament for West Bromwich East, provided a letter in support of a new injunction. Ms Richards said that she regularly hears from constituents about car cruising activity, namely along Kenrick Way and the surrounding area, with noisy cars, large gatherings and dangerous driving. She described a 'well oiled organisation working to frustrate the police attempts to control this behaviour and evade arrest'. She felt the issues had worsened since the expiration of the previous injunction and that there was serious concern amongst residents that a serious incident would occur. She added that 649 constituents in West Bromwich East had signed a petition relating to car cruising and speeding cars in the area and she fully supported the granting of a new injunction. This letter is exhibited as **Exhibit PN16**.
64. In his first witness statement dated 12 April 2022, Pardip Sandhu, who is an anti-social behaviour officer at Sandwell Metropolitan Borough Council, stated that the injunction had had a positive impact on residents, local businesses, partner agencies and the police whilst it was in force, but that there had still been incidents where the council sought further action by way of warning letters to residents.
65. Mr Sandhu said that he had spoken to a resident referred to as "Resident B", who had said that they still hear car cruising as they can hear vehicles racing up and down, causing safety concerns for children that play in the area. Another resident, referred to as "Resident E", said that they are aware of regular 'meets' on a Sunday evening at Kenrick Way, West Bromwich and therefore they did not go out after 8pm on a Sunday.
66. Mr Sandhu added that over 200 reports from local residents had been made to Sandwell Council during 2021 and 2022 regarding car cruising and nuisance bikes. Mr Sandhu also reported increasing problems with illegally ridden motorbikes, and that the injunction was being utilised to tackle this issue. I understand the statement of Pardip Sandhu will be included in the bundle of documents available to the court filed in support of this application.
67. In his statement dated June 2022, Police Sergeant Richard Phillips of the North Sandwell Neighbourhood Policing Team details very recent reports in relation to incidents of street

racing in West Bromwich, Wednesbury and Tipton. He believes that the injunction is needed to prevent the negative impact of street racing that residents and businesses continue to experience, and that since the lapse of the previous order in 2021, the number of people engaging in this activity has increased.

Dudley

68. In Dudley, in her witness statement provided in May 2022, Susan Dicks, who, until recently, was the Interim Head of Community Safety at Dudley Metropolitan Borough Council, stated that car cruising activities appeared to have increased in the period of time since the injunction had lapsed. Ms Dicks said that it was particularly prevalent along Manor Way in Halesowen, at Tesco Extra, Showcase Cinema and Stourbridge Ring Road.
69. Ms Dicks added that a deterrent was particularly important in light of the fact that since April 2016, several young people have died in high-speed road traffic collisions within the borough of Dudley. I understand the statement of Susan Dicks will be included in the bundle of documents available to the court filed in support of this application.
70. In his witness statement provided in May 2022, PC Jonathan Edwards confirms that in the last 6 months, there have been 'hotspots' noted in the Dudley area, namely Manor Way, Halesowen, Tesco car park, Castle-Gate and the Waterfront, Merry Hill. He provides details of 37 logs between October 2021 and April 2022 where reference is made to vehicles and an element of anti-social behaviour, including street racing with spectators, reports of excessive amounts of vehicles gathered, with incidents such as females being seen being driven on car bonnets and roofs, noise nuisance, verbal abuse and the smell of cannabis. PC Edwards concludes by saying that car cruising activity in Dudley has increased since the injunction lapsed and that he believes it will continue to do so unless a new order is granted. I understand the statement of PC Edwards will be included in the bundle of documents available to the court filed in support of this application.
71. Ms Dicks makes reference to a fatality in Dudley following an incident on 26 December 2016 (Boxing Day) at 22:30 hours, whereby a young woman fell from the bonnet of a moving car on the car park of Tesco Extra and sustained a serious head injury. The young woman died eight days later. I would ask the court to note that the opening hours for Tesco, Dudley on Boxing Day 2016 were 09:00 hours to 18:00 hours; I would therefore suggest that the people in the cars on the Tesco car park referred to in an Express & Star report

about the incident were not there to shop as the store was closed at the time the incident happened. Furthermore, as stated by Susan Dicks, Tesco Extra in Dudley is a known 'hotspot' location for car cruise 'meets'. I now reference **Exhibit PN17** which is a report published on the Express & Star website on 15 August 2018 in relation to the fatality and the conviction and sentencing of those involved.

72. In May 2022, James Morris, Member of Parliament for Halesowen and Rowley Regis, provided a statement in support of a new application for an injunction. In the statement, he notes that between 2015 and 2020 (whilst the injunction was in force) he received correspondence from five constituents who had reported car cruising related concerns. However, since December 2020, this had risen to thirty three constituents. He also references a petition launched in January 2021, to request greater action be taken to alleviate the problems, with 844 signatories at the time of writing. Mr Morris MP goes on to reference noise pollution leading to sleep deprivation and threatening and intimidating behaviour from car cruisers in response to residents attempting to evidence the incidents. He advises that the most recent incident reported to him was in April 2022, where police were investigating a report of several vehicles gathered at a local Shell garage. He is therefore fully supportive of the reintroduction of an injunction. His statement is provided as part of the bundle of evidence for this application.
73. In her witness statement, Faye Willetts, who is a resident living in Halesowen, reports that during the latter part of Summer 2020, she noticed that the noise from Manor Way had increased considerably during weekend evenings and, in particular, on a Sunday evening. She states that the noise sounded like numerous individuals were engaging in road racing activities, revving engines and driving at very high speeds. Mrs Willetts goes on to state that it is clear to her that individuals are using Manor Way as a race track, driving at very high speed and weaving in and out of other road users who are travelling at or below the legal speed limit. Mrs Willetts states that these events appear to be organised as they occur so regularly and the vehicles generally arrive and leave together at the same time each week, between 8.30pm and 11pm. I understand Faye Willetts' witness statement will be included in the bundle of documents available to the court filed in support of this matter.
74. In his witness statement from May 2022, John Slater-Kiernan, manager of the Shell Petrol Station on Manor Way, Halesowen, notes that the forecourt and car park of the station is still a meeting point for car cruisers and street racers, usually on Friday and Saturday evenings. He adds that the group often disperse quickly when the police arrive. On one

incident during the last 12 months, he retrieved CCTV footage of incidents on the forecourt where vehicles were doing wheel spins and donuts. He retrieved another incident from May 2022 where a large group of vehicles pulled in together, all high-performance vehicles. He then retrieved further footage from around the same time, where similar looking vehicles were driving at high speed at the opposite side of the dual carriageway. As a result, he fully supports a new injunction, and his statement is provided as part of the bundle of evidence for this application.

75. In his statement from 2022, Richard Hubbard Harris, manager of the Showcase Cinema at Castle Gate in Dudley, advises that the issues relating to vehicles gathering on the complex car park have been ongoing for a number of years. He recalls incidents during the nationwide lockdown as a result of Covid-19, where approximately 130 cars were present on CCTV footage retrieved, and that they often drive dangerously, speed around the car parks, do donuts and skid, sometimes with someone sat on car bonnets. Groups of people can be seen spectating and cheering. He adds that customers have been known to ask security guards to walk them to their cars when such incidents are occurring as they are too afraid to go out alone. Mr Hubbard Harris therefore fully supports a new injunction, and his statement is provided as part of the bundle of evidence for this application.
76. In her statement dated May 2022, Stacey Hewardine, Security Manager for Savills of the Merry Hill and Waterfront Centre in Brierley Hill, says that these areas are a hotspot for car cruising related activity, and that since January 2022 these have occurred regularly. Cars have been observed driving dangerously, doing donuts and handbrake turns, revving engines, smoking cannabis, littering and urinating. She added that members of staff have been subject to abuse and threats when trying to disperse the groups, and that sometimes the police need to be called. Security staff often have need to write to registered keepers of vehicles whose cars have been evidenced as being involved. She is aware that the most recent complaint from residents and business owners was on 6 May 2022. She therefore fully supports a new injunction, and her statement is provided as part of the bundle of evidence for this application.
77. In his statement dated May 2022, Chris Southall, Store Manager at Tesco Extra on Birmingham New Road, says that since starting in post recently, he has been made aware of a history of car cruising and 'boy racing' on the Tesco car park. He says that during sometime in early May 2022, he observed a group of males revving engines, screeching tyres and driving at high speed in the underground car park. He retrieved CCTV footage of groups attending after store closing time to drive around at speed. He says that other

staff members have witnessed cars doing donuts, hand brake turns and drag racing. He adds that with the smell of cannabis that is often prevalent, he is concerned about an accident occurring, referencing the fatality on the same car park a few years prior. He therefore fully supports the application for a new injunction, and his statement is provided as part of this bundle of evidence.

Spectators

78. I would now like to bring to the attention of the court the issue of spectators attending car cruise events/gatherings. The court will be aware that, in addition to the Black Country injunction previously in place, there are also injunctions in force in Birmingham and in Solihull. However, both the Birmingham and Solihull injunctions contain a clause prohibiting spectating; there was no such prohibition contained within the previous Black Country injunction. I understand copies of the Birmingham and Solihull injunctions will be included in the bundle of documents available to the court filed in support of this application.
79. Through attending regional meetings in regard to car cruising, my former colleague Sarah White learned that spectating in the Black Country area had become a particular cause for concern to West Midlands Police.
80. In the witness statement provided by PC Mark Campbell dated July 2022, who is the single point of contact in regard to car cruising/street racing issues within the West Midlands Force area, PC Campbell states that police have seen an increasing number of locations where large numbers of people are attending to spectate car cruising throughout the Black Country area. PC Campbell goes on to state that on a number of occasions, police officers have witnessed over 200 spectators lining the roads and roundabouts on the Black Country Route, Kenrick Way, West Bromwich and Manor Way, Halesowen.
81. PC Campbell states that the sheer number of spectators attending these car cruising 'meets' is causing a real danger, not only to themselves but to members of the public simply trying to go about their business. PC Campbell reports that spectators are often standing in the roads or at junctions, and with the speed the street racers are travelling at, the risk of harm to these spectators is massively increased.

82. I would also draw the attention of the court to an incident reported in the national media in 2019 where in Stevenage, Kent, a large group of bystanders were injured when a car ploughed into the crowd at a car cruising ‘meet’ whilst doing a ‘donut’ manoeuvre. PC Campbell exhibits a shocking video capturing the incident, which further demonstrates what can happen at so-called car cruise ‘meets’ where large crowds of spectators are in attendance.
83. From a community safety perspective, in order to reduce the risk of serious harm or fatalities, when considering the application for an injunction to prohibit car cruising across the Black Country area, I would respectfully request that the honourable court considers including a prohibition relating to spectators in any injunction the honourable court may be minded to make.

The lapse of the previous injunction

84. A hearing of the application by the four Black Country Councils to renew the previous injunction was held on 27 January 2021. The hearing was adjourned, and a new hearing date listed for 13 May 2021. Her Honour Judge Kelly, sitting as a High Court judge, refused the application to continue the injunction in the interim period and thus the injunction, which came into force in February 2015 for three years and was renewed in February 2018 for three years, expired at 23:59 hours on 1 February 2021.
85. By applications dated 10 and 11 May 2021, the Black Country Councils applied for the hearing of 13 May 2021 to be vacated and the matter adjourned generally with liberty to restore. By Order of 11 May 2021, Her Honour Judge Kelly granted these applications and ordered the matter be adjourned generally with liberty to restore.
86. It is my understanding that what troubled the honourable High Court back in January to May 2021 was High Court litigation before the Honourable Mr Justice Nicklin - *London Borough of Barking & Dagenham & Other Local Authorities (including Wolverhampton City Council and Walsall Metropolitan Borough Council) v Persons Unknown and Others [2021] EWHC 1201 (QB)*. For brevity I now refer to this as “the LBBB Litigation”. The LBBB Litigation began in November 2020 and culminated in hearings 27-28 January 2021 and the judgment of Mr Justice Nicklin was handed down 12 May 2021.
87. I understand that the thrust of the LBBB Litigation was that, of its own motion, concerned that Persons Unknown injunctions sought to restrain unauthorised encampments in local

authority areas (often referred to as “traveller Injunctions” as those injunctions primarily affected the traveller community) were being granted too readily, the High Court in London “called in” all local authorities with the benefit of traveller injunctions against Persons Unknown (or named defendants and Persons Unknown).

88. The LBBB Litigation considered, amongst other things, provisions of service of notice of injunction applications and service of injunctions on Persons Unknown and the circumstances in which courts should grant injunctions against Persons Unknown. The scope of the LBBB Litigation went far beyond traveller injunctions and the principles it considered applied to all types of Persons Unknown Injunctions (including injunctions to restrain car cruising). I further understand that in this context, and what could have been a significant change in the applicable law here as a result of the LBBB Litigation that was then appealed, back in January 2021, Her Honour Judge Kelly concluded that she simply could not determine the matter and refused the renewal of the Black Country Car Cruising Injunction and adjourned the matter pending judgment in the LBBB Litigation.
89. Judgment of the Honourable Mr Justice Nicklin in the LBBB Litigation was officially handed down on 12 May 2021. Given that Wolverhampton City Council and Walsall Metropolitan Borough Council were parties to the LBBB Litigation, I understand that Legal Services at Wolverhampton City Council and Walsall Metropolitan Borough Council had been privy to sight of the judgment a few days prior to this being handed down with an embargo on disclosing the same until it was handed down officially. Simply premised upon the developments of “Persons Unknown” litigation in the LBBB Litigation, an application was made to adjourn the hearing of the Black Country Car Cruising Injunction listed 13 May 2021 generally on 10 and 11 May 2022.
90. Judgment of the Honourable Mr Justice Nicklin in the LBBB Litigation runs to some 129 pages. It represented something of a “sea change” to the Persons Unknown Injunctions landscape. My understanding is that on the back of the Judgment of the Honourable Mr Justice Nicklin in the LBBB Litigation, a decision was made that the Black Country Car Cruising Injunction renewal application could not have continued in its form before the Court and it was questionable whether the Court had power from May 2021 to grant injunctions against Persons Unknown like car cruising/street racing injunctions.
91. I understand from discussions between colleagues in Legal Services and Counsel and my former colleagues whom the Black Country Councils and similar conversations in which I have been involved that, the Black Country Councils and the other local authorities

considered, with all due respect to the Honourable Mr Justice Nicklin, that his decision in the LBBB Litigation went too far and scuppered and removed the ability for local authorities to apply for Persons Unknown Injunctions to restrain significant activities of public nuisance and danger to the public including matters like car cruising. The local authorities in the LBBB Litigation appealed to the Court of Appeal. I understand Wolverhampton City Council and Walsall Metropolitan Borough Council were instrumental in bringing this appeal. I further understand that there were additional interveners such as High Speed Two (HS2) Limited who intervened, for example, because HS2 was concerned that the judgment went too far and precluded HS2 seeking injunctions preventing protestors hampering the installation of the HS2 rail track and infrastructure.

92. Permission to appeal had been granted when judgment was handed down on 12 May 2021 and the matter proceeded to an appeal hearing which took place on 30 November to 2 December 2021 under citation *London Borough of Barking & Dagenham & Other Local Authorities (including Wolverhampton City Council and Walsall Metropolitan Borough Council) v Persons Unknown and Others [2022] EWCA Civ 13*, the Court of Appeal handed down its judgment on 13 January 2022. I understand that the thrust of the judgment was that the Court of Appeal concluded the judgment of the Honourable Mr Justice Nicklin went too far and generally, with a few caveats, restored the Persons Unknown injunctions landscape to how it had been prior to the judgment of the Honourable Mr Justice Nicklin with the result that local authorities can again bring applications for street racing/car cruising injunctions against Persons Unknown before the court for the honourable court to consider whether to grant an injunction.
93. It is my understanding that the LBBB Litigation that was before both the High Court and the Court of Appeal, raises extremely complex legal arguments which I will not attempt to address in any further detail than that set out above. I anticipate, however, that these legal arguments and their application to the Black Country Council's application to renew its car cruising/street racing injunction, will be addressed specifically and in detail in statements of case, skeleton arguments prepared by legal representatives for the Black Country Councils and in advocates' verbal submissions made on behalf of the Claimant Black Country Councils at any hearing.

The Situation since the Lapse of the Injunction

94. In his witness statement, PC Mark Campbell states that the positive impact of the 2015 injunction was almost instantaneous, to the point that street cruiser meets virtually stopped. He states, however, that since organisers became well aware of the lapse of the order, the impact and increase in incidents has been significant. He says he has spoken to hundreds of drivers and passengers involved in car cruising and has regularly heard the comment ‘there’s no injunction now, so there’s nothing the police can do’. He strongly believes that an appropriately publicised injunction is the only effective way to improving the situation in the long term, which will assist further, specific police operations and will deter participants due to the strong, impactful message that he knows first-hand have previously had an impact.
95. PC Campbell goes on to provide data detailing the calls for service to the police from members of the public in the four Black Country local authority areas. He identifies a noticeable spike in the numbers of recorded incidents after February 2021, following the lapse of the previous injunction.
96. In his witness statement dated July 2022, Chief Superintendent Ian Green, who is the Force Lead for Operation Hercules, West Midlands Police’s response to illegal street racing, details the ways in which the force has approached the issue, in terms of the large scale operations required to cause disruption. The Force takes a staged approach in dealing with specific individuals where evidence of their activity has been obtained, but inevitably find that each measure alone has limited overall impact. He therefore feels the injunction is necessary to incorporate prevention and address the impact of the nuisance caused to communities.

The regional and national ‘picture’ and risk of displacement

- 97.. The court will be aware that there are currently injunctions in place prohibiting car cruising (including ‘spectators’) in both Birmingham and Solihull.
98. In 2019, Joanne Mason attended a multi-agency meeting of ‘Operation Hercules’ (Operation Hercules is West Midlands Police’s response to tackling car cruising/street racing across the region). At that meeting, Chief Superintendent Ian Green informed those present that after Birmingham and Solihull had obtained their car cruising injunctions – thus meaning that, with the exception of Coventry, the entirety of the West Midlands Force area was covered by anti-car-cruising injunctions – “would-be West Midlands car cruisers” were travelling to Cheddar Gorge to engage in car cruising.

99. As outlined in the statement of PC Campbell and supported by the witness statements provided by residents and local authority officers, the Black Country has already seen a significant increase in incidences of car cruising since the previous injunction lapsed on 1 February 2021. I am concerned that if there is no injunction in place in the Black Country, this problem will only get worse with displacement from other areas. It is known, from investigations into reports of breaches of the previous injunction, that would-be car cruisers travel into the Black Country area from as far afield as Wales and Leicestershire.
100. In regard to the national 'picture', over the past four years, Wolverhampton City Council has received several enquiries about our approach to tackling the car cruising issue in the Black Country from local authorities and police forces across England and Wales, including Essex, Cambridgeshire, Manchester and South Wales.
101. In December 2019, at the request of Newport City Council (Gwent), representatives from Wolverhampton City Council's Legal Services and my former colleague Jo Mason were guest speakers at an All-Wales Anti-social Behaviour Forum where we outlined the work undertaken in the Black Country area to combat the menace of car cruising. The delegates who attended reported that many areas of Wales are experiencing similar issues and were very keen to hear how the Black Country had tackled the issue.
102. Incidents reported in the media include the one in Stevenage referenced in paragraph 71 above. More recently, an incident was reported to have occurred during the recent Easter weekend 2021 in Essex. I now reference **Exhibit PN18** which is a press report of the recent car cruise 'meet' in Essex that attracted around 450 cars in a blatant breach of the Public Space Protection Order that is in place as well as Covid-19 regulations.
103. The conversations that have taken place with colleagues across England and Wales, together with national media coverage, has led us to the conclusion that car cruising is not confined solely to the West Midlands; it is in fact a national problem.

Seeking a longer-term solution to the problem of car cruising

104. Recognising, the scope and the longer-term nature of the problem, the City of Wolverhampton Council has commenced work on a project to seek a national solution to the problem of car cruising. The project is at an early stage; public consultation has been

undertaken and evidence is currently being gathered from first responders regionally and nationally (police, fire and ambulance services). This project is being pursued with an open mind and the case for various solutions and the merits and practicalities of different options is being considered.

105. These options, whilst entirely hypothetical at the time of writing, involve consideration of whether a change in the law through primary legislation should be considered, whether such legislation should make car cruising a criminal offence and how that would be policed, whether such legislation should be a “bespoke” injunction or whether the existing tools and powers (such as injunctions pursuant to section 222 of the Local Government Act 1972, or even public spaces protection order pursuant to section 59 of the Anti-Social Behaviour, Crime and Policing Act 2014 are sufficient).
106. Once all data and evidence are available, if the conclusion is that further or new tools and powers are required, a business case led by the City of Wolverhampton Council on behalf of the constituent authorities in the West Midlands Combined Authority area (Birmingham, Coventry, Dudley, Sandwell, Solihull, Walsall and Wolverhampton) will be put to the West Midlands Combined Authority (WMCA), the Police and Crime Commissioner’s Office (PCC), promoting the dangers and negative impact of car cruising on their agendas and seek to persuade bodies such as the WMCA and PCC to lobby the powers that be to effect the changes that may be required to curb and control incidences of car cruising on a national level.

Further feedback received from members of the public following July 2022 press release

107. On 4 July 2022, City of Wolverhampton Council circulated a press release in relation to the new injunction application (**Exhibit PN19**), which invited members of the public to submit comments and observations regarding street racing and the application itself. A large number of comments and enquiries were received, and I will provide an overview here.
108. On 4 July 2022, a resident in Dudley emailed the anti-social behaviour team (ASBT) inbox, to comment that he has reported street racing in his catchment area to the police and local councillors in Brierley Hill. He said he had reported cars meeting up, skidding and speeding at the Waterfront car park in Merry Hill. He said the number of cars varies between 2 to 6 and some of them speed and skid ‘like idiots’.

109. On 4 July, a resident in Stourbridge emailed the ASBT inbox, wishing to advise of high-speed car racing on Mill Race Lane, Stourbridge. They stated that it happens most nights of the week, but particularly on Friday and Saturday evenings between 9pm and 11.30pm. They said the gatherings are normally outside the “Full Throttle Indoor Raceway” go kart centre and proceed along the full length of Mill Race Lane, and apart from being a danger to themselves, they are a danger to anyone visiting local facilities along the lane. They concluded “the speeds they drive at are EXCESSIVE!!!”
110. On 4 July, a resident in Halesowen emailed the ASBT Inbox, saying they had heard about the street racing injunction application, commenting “About time!”. They said they live ‘a stone’s throw’ from the Halesowen bypass and the ring road, and that they are sick to death of being woken up by anti-social individuals racing on those roads. They said it happens most nights and more so over the weekends, and that it is annoying, especially when there is no apparent action being taken to stop them. They added that the fines, bans and impounded cars would be substantial. They concluded by saying that they were fed up of offenders getting away with it and not being held accountable for their actions.
111. On 4 July, a local councillor for Brierley Hill ward in Dudley emailed the ASBT Inbox, reporting that frequent street racing meetings have been taking place in recent months at the main car park for the Waterfront Business Park on Waterfront Way, Brierley Hill. He advised that dozens of cars are turning up and driving dangerously, racing, braking and performing donuts, and that lives of pedestrians and other road users were therefore at risk of injury or fatality.
112. On 4 July, a man describing himself as “a disabled resident living on West Bromwich Road in Walsall”, emailed the ASBT Inbox to state that he could not welcome the proposals to try to prevent street racing enough. He said “as a person living with MS and impaired mobility in particular, the speed at which vehicles travel along my road is quite frightening to say the least. The backfiring of speeding vehicles sounds like gunshots, and I am sure that some of these vehicles cannot be legally on the road i.e. I cannot see how they would pass an MOT for starters”. He added “the police need to start a monitoring campaign and stop vehicles to see if they meet the current law with MOT’s etc. I would not attempt to cross the road to even post a letter because of the speeding traffic. I have campaigned for more traffic calming measures on this road to no avail.”

113. On 4 July, a resident emailed the ASBT Inbox to say “boy racers are using Blackwood Avenue, Wednesfield, Wolverhampton as a race track, if it’s not stopped someone is going to get killed. The main culprit is using a quad bike, this was occurring all weekend.”
114. On 5 July, a resident of West Bromwich emailed the ASBT Inbox to say that she welcomed the proposals to put an end to street racing. She said racing in the area in which she lives is a nuisance, and that late at night (from 11pm onwards), cars can be heard racing along Trinity Way with loud exhausts, screeching brakes and vehicles ‘whizzing’ up and down. She said she believes that the boy racers congregate in the vicinity of Kenrick Way, using Kenrick Way, the island at the junction of Trinity Way/Kenrick Way and Trinity Way towards the expressway as some sort of circuit. She added that now the hot weather is upon us, windows have to remain closed due to the noise from boy racers speeding, which she described as ‘no fun’. She said that if windows are left open, sleep is disturbed and this impacts on her work commitments. She added that she sincerely hopes that it is dealt with before someone is killed. She concluded that given there are several sets of crossings for pedestrians along Trinity Way, she hoped that residents could enjoy a decent quality of life without sleep being impacted by ‘selfish boy racers.’
115. On 5 July, a resident in Walsall contacted the ASBT Inbox to complain about the ‘regular dangerous situation in Aldridge’. He said that he often walks or commutes through Aldridge, and over the last few months has on several occasions witnessed a group of men riding motorcycles very dangerously, whilst wearing bandanas or hoodies, with no safety helmets and sometimes with two people per bike. He said he has seen groups of up to 10 motorcycles or more, and that they ride at high speed whilst totally ignoring road signals, road junctions, traffic lights, grass verges, pedestrians on footpaths and even the direction of traffic. He added that he has heard the group ‘tearing around Aldridge’ from his garden, and that it is a repeat problem.
116. On 5 July, a resident of Wolverhampton emailed the City of Wolverhampton Council’s ‘Litigation’ team inbox, to comment that he was glad that the issue was being tackled, as there always seems to be a gathering around the B&Q store in the Sedgemoor Park area. He added that the cars that pass his house are usually loud, which at night is unbearable as they race up and down Wolverhampton Road East, revving their engines so that the exhausts pop and cause loud bangs. He added that he hoped some headway would now be made.

117. On 4 July, a resident in Willenhall emailed the Litigation inbox to comment that they were in support of the street racing ban, adding that the Essington Road in New Invention is used nightly as a racetrack, with cars overtaking and reaching speeds of what looks like 60 plus miles per hour. He added that both cars and motorbikes will race at high speed, and that it will not be long before there is a serious accident or fatality.
118. On 4 July, a resident in Walsall emailed the Litigation inbox to comment that they were delighted to hear that we are seeking the injunction. She said that she regularly hears vehicles speeding along the A34 between Walsall and Broadway, usually well into the evening. She said she sometimes hears motorbikes and other times, high performance cars. She said the roads are straight and wide, and despite being in a residential area, the speeds being driven at are ridiculous, without any care for others.
119. On 4 July, a resident in Walsall emailed the Litigation inbox to say that they strongly uphold an injunction against street racing, especially in Walsall, as they live on the edge of a large industrial estate, with their lane being one of the roads that leads to the estate. They said that the worst times are during weekends when factories are closed, and the roads are clear of traffic. Drivers then use the roads as a race track, which can be heard from their house as they race around revving engines. They added that the 'aftermath of handbrake turns' can be seen on the road. They concluded that they would strongly agree with anything the court could do to stop and severely punish anyone who is participating in this illegal activity, as they feel that these people do not realise that they are also putting members of the public and other road users at risk.
120. On 7 July, a resident who did not detail where they reside, emailed the Litigation inbox, attaching an email they had sent to the same inbox in January 2021, in response to the proposed renewal of the previous injunction. This resident stated that they were forwarding their email in light of the recent press release, as they were still standing by their comments made back then. In the email dated 20 January 2021, he said that as an ex-police traffic Sergeant who retired before having the benefit of such an injunction, he had regularly witnessed incompetent and reckless driving being displayed by boy racers along the Black Country Route. He added that the noise nuisance caused by the large groups and illegal exhaust systems created an awful stress to anyone living within earshot of behaviour he described as 'disgusting'. He therefore strongly supported the injunction.
121. On 9 July, a resident of Streetly in Sutton Coldfield contacted the Litigation inbox to comment that our proposed actions 'are a very good idea', stating that street racing is a

community nuisance everywhere, and that something should be done to attempt to stop this selfish and dangerous behaviour. She said she suffers nearly every day, especially in the evenings, and that she hopes our action has a great effect on the situation and makes everyone's lives in the community quieter and safer. She concluded that these drivers should be stopped and punished severely to make them realise that what they are doing is totally against the law.

Conclusion

122. In summary, the Black Country Councils will argue that witness statements provided by members of the public and businesses and police data from February 2015 to 1 February 2021 (when the previous injunction was in force) showed a significant reduction in car cruising in most areas across the Black Country.
123. Concerningly, police data and witness evidence show there has been a significant increase in car cruising activity since the injunction lapsed on 1 February 2021.
124. I would request the court to consider the experiences of the over 100 local residents and businesses who provided witness statements in 2013/14 outlining their suffering due to the anti-social and dangerous activity of car cruising. There is no doubt that these people will not want to see a return to pre-2015 levels of anti-social behaviour from car cruising. For the residents who have made contact with us so far in 2021 and 2022, I am seriously concerned about the impact on their mental health and well-being. I firmly believe it is the duty of the authorities to protect law-abiding citizens from this behaviour.
125. I would also ask the court to note that in 2016, injunctions banning car cruising were granted for the whole of Birmingham and Solihull local authority areas. It is vital therefore that the Black Country area has an injunction in place in order to avoid any possible displacement of car cruising from these areas into Walsall, Sandwell, Dudley and Wolverhampton.
126. I believe it is vital that we have an injunction in place across the Black Country area to enable West Midlands Police and the four Black Country councils to continue to tackle the dangerous and anti-social activity of car cruising. As already detailed, when considering this injunction application, I respectfully request the court to consider the inclusion of a prohibition on spectators for the reasons outlined.

127. To conclude, I wholeheartedly feel that the previous injunction was successful in significantly reducing the menace of car cruising across the Black Country area. While the previous injunction was in place, a strong partnership approach to this issue between West Midlands Police and the four Black Country councils to tackling the issue of car cruising was develop and this continues at the time of writing, and both the Black Country Councils and West Midlands Police are committed to ensuring this relationship will continue. There is overwhelming support for an injunction from local residents and businesses who, prior to the previous injunction being in place, had all suffered for many years and who are concerned that, without an injunction in place, the scale of the car cruising issue will return to the levels experienced pre-2015.

Statement of Truth

I believe that the facts stated in this witness statement are true. I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

Name of Claimant: Wolverhampton City Council

Pardip Nagra

Date 19/07/22

Print name in full PARDIP NAGRA

i) Statement of: Pardip Nagra
ii) Statement No: 1
iii) For: Claimants
iv) Dated: 19 July 2022
v) Exhibits: PN1-PN19

**IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION**

CLAIM NO:

B E T W E E N:

**(1) WOLVERHAMPTON CITY COUNCIL
(2) DUDLEY METROPOLITAN BOROUGH COUNCIL
(3) SANDWELL METROPOLITAN BOROUGH COUNCIL
(4) WALSALL METROPOLITAN BOROUGH COUNCIL**

Claimants

and

PERSONS UNKNOWN

Respondents

EXHIBIT PN1

This is the document referred to as "Exhibit PN1" in the witness statement of Pardip Nagra dated 19 July 2022.

i) Statement of: Lisa Fox
ii) Statement No: 1
iii) For: Claimants
iv) Dated: 02.11.2013
v) Exhibits: -

IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION

CLAIM NO:

BETWEEN:

(1) WOLVERHAMPTON CITY COUNCIL
(2) DUDLEY METROPOLITAN BOROUGH COUNCIL
(3) SANDWELL METROPOLITAN BOROUGH COUNCIL
(4) WALSALL METROPOLITAN BOROUGH COUNCIL

Claimants

and

PERSONS UNKNOWN

Defendants

WITNESS STATEMENT OF LISA FOX

I Lisa Fox of [REDACTED] Finneywell Close, Wolverhampton, West Midlands, WV14 9XN, WILL SAY AS FOLLOWS:

1. I am a resident living at the above address.
2. This statement is in relation to boy racers who congregate on a Sunday night for the past year on the Black Country Route near to The Elizabeth Arms Public House. Over the last year after about eight o'clock in the evening on Sunday evenings a large gathering of noisy vehicles are parked up to the rear of my address.
3. The property is a modern double glazed address and whilst my family are inside the property we can hear the excessive noise from the vehicles' engines causing us unnecessary anti-social noise. Articles within the property will shake and vibrate from this noise. My young daughter, who is aged 10 years old, cannot sleep from this noise. On particular evenings this will continue beyond eleven o'clock at night.

4. I would estimate that our address from the Elizabeth Arms Public House is about 300 yards from where they are parked.
5. The situation has become so bad that I have called the police on two occasions this year complaining of the excessive noise.
6. My first log was on 13th January 2013 at 21:04 hours (Ref: 1815) when I made a call to the police complaining of vehicle revving and racing.
7. I made a second call on 24th February 2013 at 21:58 hours (Ref: 2084) which was again a complaint of noise from vehicles.
8. I would support a police injunction against these road racers to stop the noise and inconvenience that the vehicles are causing on a Sunday night to my life.

TATEMENT OF TRUTH

I believe that the facts stated in this Witness Statement are true.

Full Name: Lisa Fox

Name of Claimant: Wolverhampton City Council

Signed *Lisa Fox*

Print Name LISA FOX

Dated 2. 11. 13

- i) Statement of: L Fox
- ii) Statement No: 2
- iii) For:
- iv) Dated:
- v) Exhibits:

**IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION**

CLAIM NO:

B E T W E E N:

- (1) WOLVERHAMPTON CITY COUNCIL**
- (2) DUDLEY METROPOLITAN BOROUGH COUNCIL**
- (3) SANDWELL METROPOLITAN BOROUGH COUNCIL**
- (4) WALSALL METROPOLITAN BOROUGH COUNCIL**

Claimants

and

PERSONS UNKNOWN

Defendants

WITNESS STATEMENT OF LISA FOX

I Lisa Fox of [REDACTED] Finneywell Close, Wolverhampton, West Midlands, WV14 9XN, WILL SAY AS FOLLOWS:

1. I am Lisa Fox and I live at the above address.
2. This is the second statement I am making in relation to the problem of 'boy racers' who congregate on the Black Country Route near to The Elisabeth Arms Public House.
3. I would estimate that our address from the Elisabeth Arms Public House is about 300 yards from where they are parked.
4. Since I made my last statement in October 2013, I haven't heard the noise from the boy racers as often. I used to hear them every Sunday evening but I would say that nowadays I hear them on average once every 4 weeks.

5. This may be because residents are calling the police and they arrive quickly and the boy racers move on. Or it could be that they are gathering in other areas along the Black Country route.

6. Although the frequency of these gatherings is less often than it used to be, when they do happen this has a detrimental impact on mine and my family's quality of life. As I mentioned in my previous statement, when these gatherings occur, items in my house will shake and vibrate from the noise and my young daughter cannot sleep.

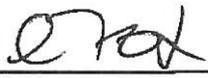
7. I would support a police injunction against these boy racers to stop the noise and inconvenience that they are causing.

STATEMENT OF TRUTH

I believe that the facts stated in this Witness Statement are true.

Full Name: Lisa Fox

Name of Claimant: Wolverhampton City Council

Signed 
Print Name LISA FOX
Dated 29/7/14.

i) Statement of: Pardip Nagra
ii) Statement No: 1
iii) For: Claimants
iv) Dated: 19 July 2022
v) Exhibits: PN1-PN19

**IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION**

CLAIM NO:

B E T W E E N:

**(1) WOLVERHAMPTON CITY COUNCIL
(2) DUDLEY METROPOLITAN BOROUGH COUNCIL
(3) SANDWELL METROPOLITAN BOROUGH COUNCIL
(4) WALSALL METROPOLITAN BOROUGH COUNCIL**

Claimants

and

PERSONS UNKNOWN

Respondents

EXHIBIT PN2

This is the document referred to as "Exhibit PN2" in the witness statement of Pardip Nagra dated 19 July 2022.

i) Statement of: *Peter James*
ii) Statement No: 1
iii) For: *claimants*
iv) Dated: *09.11.2013*
v) Exhibits: -

IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION

CLAIM NO:

BETWEEN:

(1) WOLVERHAMPTON CITY COUNCIL
(2) DUDLEY METROPOLITAN BOROUGH COUNCIL
(3) SANDWELL METROPOLITAN BOROUGH COUNCIL
(4) WALSALL METROPOLITAN BOROUGH COUNCIL

Claimants

and

PERSONS UNKNOWN

Defendants

WITNESS STATEMENT OF PETER JAMES

I, Peter James of [REDACTED] Moor Street, Wednesbury, West Midlands, WS10 0QR, WILL SAY AS FOLLOWS:

1. I am Peter James and I am a resident living at the above address.
2. At about 22:45 hours on Sunday 2nd September 2012 I had driven down Dudley Street, Wednesbury in my car accompanied by my girlfriend, it's actually her car not mine. I was facing downhill and was approaching the island at the A41 Black Country New Road. I had to stop at the island because I was unable to flow into traffic due to approximately 25 boy racers in modified cars driving around the island. I could see that they were all together as a group because they were all behind each other. The cars consisted of Golfs, Subarus, etc. I saw cars with spoilers fitted to the back, skirts to the side with neon lights on, tinted windows and really loud exhausts.
3. My girlfriend made a comment complaining about the boy racers being here again. We were at the island for about two minutes until we were able to get

on. Most of the cars went around the island about 5-6 times and it's quite a big island. This just held us all up as other cars were waiting to get on. There were approximately 3-4 people in each car and they were all laughing. It was frustrating as there was no need to drive in the manner in which they did.

4. Every Sunday this happens, I am just glad I don't live by it. Whilst these cars were driving around the island more cars were turning up coming along the A41 from my left and going down the filter lane into Hallens Drive, they were all boy racers travelling at ridiculous speeds.
5. As I got a chance to get on the island to turn left (1st exit) I continued to the next island which the 3rd exit into Leabrook Road (I was going to Bannister Road). I reach the next island and saw 5-6 vehicles travelling around the island and they were again repeatedly driving around the island flicking the 'Vs' up at the motorists who were trying to go about their business. One of them had pulled his trousers down and was exposing himself whilst going round the island.
6. The main concern at that time was a metallic blue Vauxhall Astra where the passenger was pouring a liquid onto the road surface from an open passenger door whilst the vehicle was in motion. This worried me as it was just dangerous for everybody. They eventually all split, some went off to Hallens Drive and some drove off up the A41 towards Great Bridge at the Asda. They are a pain when they gather there as well because they go from the Asda at Great Bridge back and forwards to Hallens Drive in Wednesbury.
7. I eventually got onto the island taking great care because I didn't know what had been poured onto the road and entered Leabrooke Road turning right into Bannister Road, where my girlfriend lives.
8. The whole situation of the boy racers meeting every Sunday is depressing and annoying. They gather in large numbers and they are doing something they shouldn't and it's causing a nuisance to all other road users and I presume residents and workers, especially in Hallens Drive. It's been going on for years now and I am just fed up with it.

9. I am a keen fisherman and have enjoyed going fishing for a long time. I used to fish regular on the canal at Hallens Drive in Wednesbury, it's a nice little spot. But as time has gone on I got to a Saturday and thought I would go fishing down by Hallens Drive but then I would remember that that would be Sunday and the boy racers would be there so I wouldn't go then. I didn't want to go because the noise of the cars, listening to them skidding around the island by the canal, doing doughnuts, etc. Also there's lots of kids on the canal bank, kids on the towpath on motorbikes, there's litter getting dropped as well. I just stopped going down there to go fishing because of them and I enjoyed it down there. Now I just walk the dog instead of going down there.
10. All in all they cause a nuisance every Sunday, they have stopped me from enjoying my past time. My girlfriend at the time used to freeze with fear when she was driving as they all came speeding past.
11. The police do what they can but they can't always be there every Sunday. I just hope that something gets done about it to reduce the dangers and the numbers that turn out.
12. I've had some nice times fishing down there and I look forward to returning one day if the boy racers disappear.

STATEMENT OF TRUTH

I believe that the facts stated in this Witness Statement are true.

Full Name: Peter James

Name of Claimant: Sandwell Metropolitan Borough Council

Signed Peter James

Print Name PETER W JAMES

Dated 9/11/13

i) Statement of: Pardip Nagra
ii) Statement No: 1
iii) For: Claimants
iv) Dated: 19 July 2022
v) Exhibits: PN1-PN19

**IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION**

CLAIM NO:

B E T W E E N:

**(1) WOLVERHAMPTON CITY COUNCIL
(2) DUDLEY METROPOLITAN BOROUGH COUNCIL
(3) SANDWELL METROPOLITAN BOROUGH COUNCIL
(4) WALSALL METROPOLITAN BOROUGH COUNCIL**

Claimants

and

PERSONS UNKNOWN

Respondents

EXHIBIT PN3

This is the document referred to as "Exhibit PN3" in the witness statement of Pardip Nagra dated 19 July 2022.

i) Statement of: Carl Yeomans
ii) Statement No: 1
iii) For: claimants
iv) Dated: 07. 11. 2013
v) Exhibits: -

IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION

CLAIM NO:

BETWEEN:

(1) WOLVERHAMPTON CITY COUNCIL
(2) DUDLEY METROPOLITAN BOROUGH COUNCIL
(3) SANDWELL METROPOLITAN BOROUGH COUNCIL
(4) WALSALL METROPOLITAN BOROUGH COUNCIL

Claimants

and

PERSONS UNKNOWN

Defendants

WITNESS STATEMENT OF CARL YEOMANS

I, Carl Yeomans of [REDACTED] Field Road, Bloxwich, WS3 3HZ, WILL SAY AS FOLLOWS:

1. I am Carl Yeomans and I live at the address stated above.
2. On 15th July 2013, I provided a witness statement to West Midlands Police regarding ongoing incidents of large gatherings of youths in motor vehicles, playing loud music, revving engines and racing around the industrial estate at Brickyard Road, Aldridge.
3. On Sunday 28th July, I again had cause to contact the police as there was a large gathering of vehicles in Brickyard Road from 21.30 hours onwards. Up to around 30 vehicles had attended this location, they were again playing loud music, several of these vehicles were racing each other around the estate. I reported this as it is ongoing and our quality of life is being affected, every Sunday for the past few weeks, I along with several other residents in the area, have had to put up with this anti-social behaviour.

4. I also had cause to contact the police the next Sunday evening, being 4th August 2013, as again a large gathering of youths in motor vehicles had attended Brickyard Road, again around 21.00 hours in the evening, they were racing around the estate, making it unsafe for us to travel, and difficult to rest as most of us had work early on Monday morning. On this evening I, along with another resident, went into Brickyard Road and started taking number plates of these vehicles that were racing, when they saw me do this, some of the youths became abusive and beeping horns at us.

5. I have provided PC 6571 Pemberton with details of these vehicle registrations that I have obtained at 17.30 hours on Friday 9th August 2013, at Aldridge Police Station.

STATEMENT OF TRUTH

I believe that the facts stated in this Witness Statement are true.

Full Name: Carl Yeomans

Name of Claimant: Walsall Metropolitan Borough Council

Signed Carl Yeomans

Print Name CARL YEOMANS

Dated 7/11/13

- i) Statement of: C Yeomans
- ii) Statement No: 2
- iii) For: Claimant
- iv) Dated:
- v) Exhibits:

**IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION**

CLAIM NO:

B E T W E E N:

**(1) WOLVERHAMPTON CITY COUNCIL
(2) DUDLEY METROPOLITAN BOROUGH COUNCIL
(3) SANDWELL METROPOLITAN BOROUGH COUNCIL
(4) WALSALL METROPOLITAN BOROUGH COUNCIL**

Claimants

and

PERSONS UNKNOWN

Defendants

WITNESS STATEMENT OF CARL YEOMANS

I, Carl Yeomans of Marina, Brickyard Road, Aldridge, WS9 8SR, WILL SAY AS FOLLOWS:

1. I am Carl Yeomans and I live at the address stated above.
2. This is the second statement I am making regarding the 'boy racers' in the Brickyard Industrial Estate on Sunday evenings.
3. I can state for the past few weeks this problem has improved. I know this is due to the police being in the area of Brickyard Industrial Estate on Sunday evenings.
4. However, this 'car cruising' has been going on for at least 5 years; I know as soon as the police stop patrolling every Sunday evening then the gatherings will return.

5. There are still vehicles that I suspect are 'boy racers' who visit the estate on Sunday evenings and upon seeing the police they leave the area.
6. I am aware the Police and the Council are still trying to obtain an injunction. I really hope they are able to get this as it will improve our quality of life.

STATEMENT OF TRUTH

I believe that the facts stated in this Witness Statement are true.

Full Name: Carl Yeomans

Name of Claimant: Walsall Metropolitan Borough Council

Signed Carl Y

Print Name CARL YEOMANS

Dated 29/7/14

i) Statement of: Pardip Nagra
ii) Statement No: 1
iii) For: Claimants
iv) Dated: 19 July 2022
v) Exhibits: PN1-PN19

**IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION**

CLAIM NO:

B E T W E E N:

**(1) WOLVERHAMPTON CITY COUNCIL
(2) DUDLEY METROPOLITAN BOROUGH COUNCIL
(3) SANDWELL METROPOLITAN BOROUGH COUNCIL
(4) WALSALL METROPOLITAN BOROUGH COUNCIL**

Claimants

and

PERSONS UNKNOWN

Respondents

EXHIBIT PN4

This is the document referred to as "Exhibit PN4" in the witness statement of Pardip Nagra dated 19 July 2022.

i) Statement of: David Philip Clark
ii) Statement No: 1
iii) For: Claimant
iv) Dated: 12.03.2014
v) Exhibits: DPC1 - DPC2

IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION

CLAIM NO:

BETWEEN:

(1) WOLVERHAMPTON CITY COUNCIL
(2) DUDLEY METROPOLITAN BOROUGH COUNCIL
(3) SANDWELL METROPOLITAN BOROUGH COUNCIL
(4) WALSALL METROPOLITAN BOROUGH COUNCIL

Claimants

and

PERSONS UNKNOWN

Defendants

WITNESS STATEMENT OF DAVID PHILIP CLARK

I, David Philip Clark of Johnson Controls Automotive (UK) Limited, Hallens Drive, Wednesbury, WILL SAY AS FOLLOWS:

1. I am David Clark and I am employed by Johnson Controls (UK) Limited, Hallens Drive, Wednesbury, as a Health & Safety Co-ordinator. I have worked at Johnson Controls for 16 years.
2. I am making this statement in relation to the problems that the gatherings of 'boy racers' are causing in the Hallens Drive area and the impact it is having on our business.
3. Johnson Controls is a large, multi-national corporation whose international head office is in Milwaukee, USA. Johnson Controls is one of the largest employers in the Wednesbury area, having approximately 340 employees. We are a first line automotive supplier, manufacturing foam for car seating for the vast majority of the UK car industry.

4. Since at least 2011, 'boy racers' have been gathering and illegally racing in Hallens Drive and the surrounding area on most Sunday evenings from around 10.00pm. Typically, these gatherings involve up to 250 vehicles that are either parked or are racing around the area causing traffic congestion. The cars race each other at high speeds up and down Hallens Drive, often filming each other.
5. The gatherings also attract a large number of spectators; I would estimate up to 300 people of all ages, including families. The spectators stand close to the road cheering the 'boy racers' on, which is extremely dangerous given the speeds at which the vehicles are racing each other.
6. There has already been a serious accident when one of the cars crashed and a young man had to be cut free from the vehicle by the emergency services. I believe it is only a matter of time before there is a fatality, either a 'boy racer', a spectator, an employee of Johnson Controls or delivery driver, or a member of the public.
7. When these gatherings occur, both sides of Hallens Drive have vehicles parked on either side of the road. This obstructs and causes a danger to vehicles trying to access and exit Johnson Controls site. This also impacts on other businesses in the area, including Warburtons.
8. Johnson Controls' plant operates 24 hours a day, 7 days a week to meet manufacturing deadlines. We have chemical tankers arriving at and leaving the plant night and day. Due to the hazardous chemicals involved in our manufacturing process, Johnson Controls is classed as a lower tier Control of Major Accidents and Hazards (COMAH) site. The chemicals we use are mainly toluene diisocyanate and metamethane.
9. If there were to be a collision involving a chemical tanker this would have serious consequences for the safety of the general public and would be a major incident for the emergency services. This is because if these hazardous chemicals escape into the atmosphere they could potentially cause fatal breathing problems and would involve immediate evacuation not only of the Johnson Controls' plant itself but, depending on the severity, evacuation spanning a 5 mile radius of the site.

10. Access to Johnson Controls' site main gate is often blocked by spectators and when the 'boy racers' are all in convoy or are racing each other up and down Hallens Drive it makes it extremely difficult for the delivery vehicles to get on and off the site. There have been occasions when members of staff from Johnson Controls have had to go out onto Hallens Drive and attempt to stop the traffic themselves just to enable the tankers to get in and out. This in itself is extremely dangerous. The DVD accompanying this statement [Exhibit D11] shows a vehicle attempting to leave our site; the headlights of the 'boy racers' passing in convoy are clearly visible. Although the footage was captured on 7 October 2011, I would point out that in 2014 this activity continues to be typical Sunday evening in Hallens Drive.
11. Many of the tankers/delivery vehicles come from all over mainland Europe and are on tight timelines for ferry crossings and tachograph restrictions. The delays the drivers are experiencing when trying to deliver to Johnson Controls site are having a serious detrimental impact on their businesses. In fact some of the companies are telling us they do not want to deliver to us anymore because of the problems they are experiencing.
12. In addition to the danger posed by these 'boy racer' gatherings and the detrimental impact this is having on our business and that of our suppliers, I am also extremely concerned about the criminal and anti-social behaviour of some of the individuals.
13. I produce photographs [Exhibits D12] that show the criminal damage that was done to a delivery vehicle when a plastic barrier was thrown at the windscreen by someone attending one of these gatherings. The driver was in the cab of his vehicle when the damage was done.
14. Approximately a quarter of Johnson Controls (Wednesbury) employees are females. I have received numerous complaints from female staff who state that males attending the 'boy racer' gatherings regularly abuse them with comments of a sexual nature when they are arriving at work to start their shifts on Sunday evenings. Understandably, the women find this behaviour towards them extremely intimidating and upsetting. I am concerned that a partner of one of the woman when dropping her off at work will take exception to this behaviour and that this may result in an altercation.

15. Of further annoyance is the amount of littering that occurs at these gatherings. Spectators turn up with take-away food, drinks, cans, etc and just discard them in Hallens Drive. This is extremely unsightly and reflects badly on the area.
16. The local police attend when they can which helps at the time but, as soon as the police leave the location, the 'boy racers' return.
17. In summary, the behaviour of these 'boy racers' and the spectators who attend these gatherings are posing a serious threat not only to Johnson Controls employees and delivery drivers, but also to employees of other companies in the local area, the general public and other road users. The behaviour is also adversely affecting our manufacturing process which our UK head office is aware of.

STATEMENT OF TRUTH

I believe that the facts stated in this Witness Statement are true.

Full Name: David Philip Clark

Name of Claimant: Sandwell Metropolitan Borough Council

Signed

Print Name

Dated



DAVID P. CLARK

12th MARCH 2014.

i) Statement of: David Phillip
Clarke
ii) Statement No: 1
iii) For: Claimants
iv) Dated: 12.03.2014
v) Exhibits: DPC1 – DPC2

**IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION**

CLAIM NO:

B E T W E E N:

**(1) WOLVERHAMPTON CITY COUNCIL
(2) DUDLEY METROPOLITAN BOROUGH COUNCIL
(3) SANDWELL METROPOLITAN BOROUGH COUNCIL
(4) WALSALL METROPOLITAN BOROUGH COUNCIL**

Claimants

and

PERSONS UNKNOWN

Defendants

EXHIBIT DPC1

**This is the document referred to as Exhibit DPC1 in the witness statement of
David Phillip Clarke dated 12.03.2014**

EXHIBIT DPC1 is a DVD of Video
Footage taken at Johnson Controls,
Hallens Drive, Wednesbury on 07
October 2011

i) Statement of: David Phillip
Clarke
ii) Statement No: 1
iii) For: Claimants
iv) Dated: 12.03.2014
v) Exhibits: DPC1 – DPC2

**IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION**

CLAIM NO:

B E T W E E N:

**(1) WOLVERHAMPTON CITY COUNCIL
(2) DUDLEY METROPOLITAN BOROUGH COUNCIL
(3) SANDWELL METROPOLITAN BOROUGH COUNCIL
(4) WALSALL METROPOLITAN BOROUGH COUNCIL**

Claimants

and

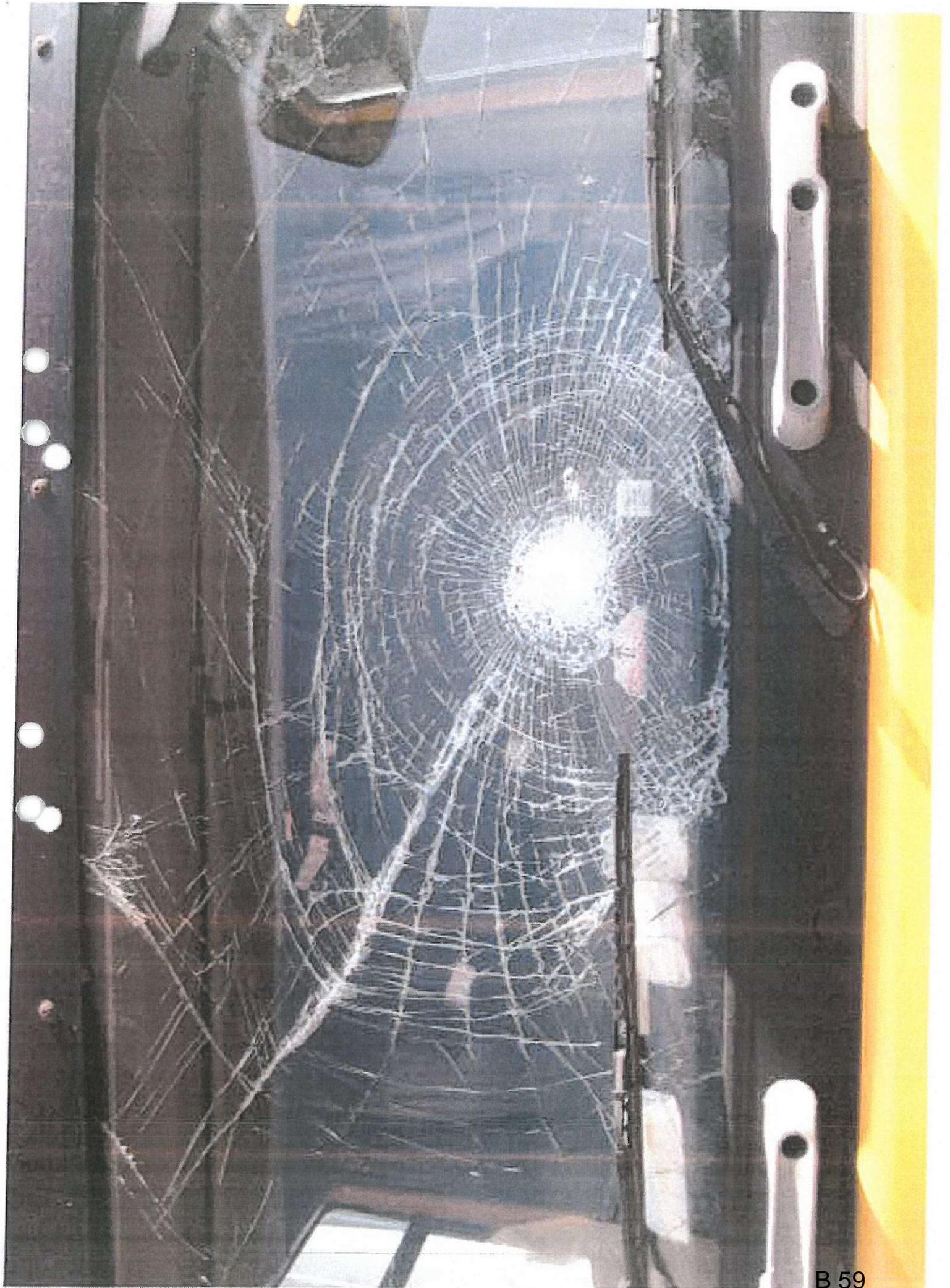
PERSONS UNKNOWN

Defendants

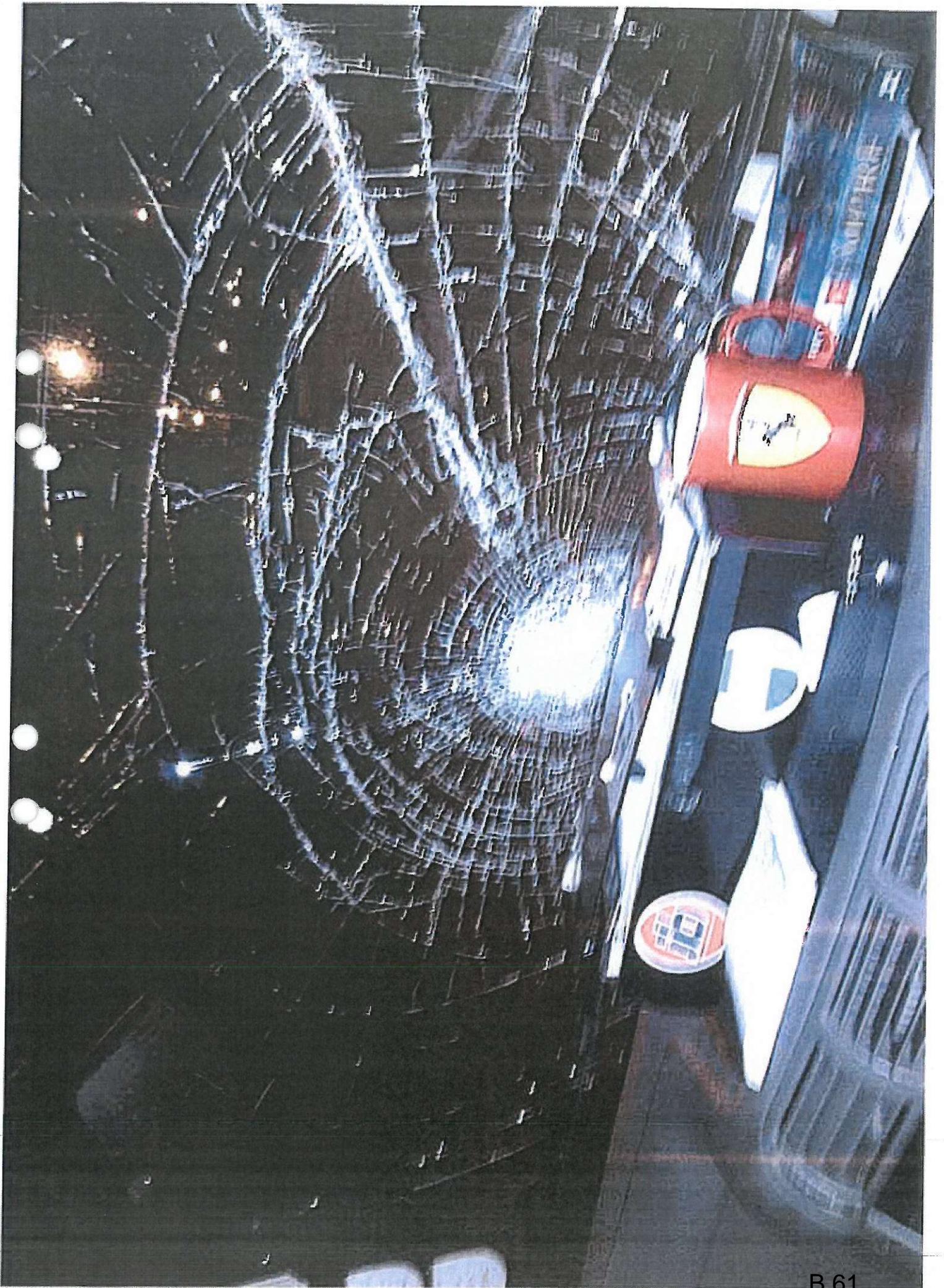
EXHIBIT DPC2

**This is the document referred to as Exhibit DPC2 in the witness statement of
David Phillip Clarke dated 12.03.2014**

EXHIBIT DPCZ















i) Statement of: *David Phillip Clarke*
ii) Statement No: *2*
iii) For: *Applicant*
iv) Dated: *17/07/2014*
v) Exhibits: *DFC 1*

IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION

CLAIM NO:

BETWEEN:

(1) WOLVERHAMPTON CITY COUNCIL
(2) DUDLEY METROPOLITAN BOROUGH COUNCIL
(3) SANDWELL METROPOLITAN BOROUGH COUNCIL
(4) WALSALL METROPOLITAN BOROUGH COUNCIL

Claimants

and

PERSONS UNKNOWN

Defendants

WITNESS STATEMENT OF DAVID PHILIP CLARK

I, David Philip Clark of Johnson Controls, WILL SAY AS FOLLOWS:

1. I am the above named person and work at Johnson Controls in Wednesbury as a Health and Safety Coordinator. The company itself manufactures the foam for car seats. We are a large company and employ 314 people. At any one time there are just over 100 people due to us having three shift changes.
2. This is the second statement I am making regarding the problems we have in relation to the boy racers that attend Hallens Drive.
3. We have at times approximately 300 people lined up and down the road. They stand and watch the cars racing up and down. They drive dangerously and exceed the speed limit. Somebody will be killed one day.
4. We have problems such as obstructions to the entrance to our site. This is where on a Sunday night the entrance gates are blocked by the boy races that park there. People we employ cannot get in our out of the site due to this. They also get verbal abuse from the spectators when they try and get out.

5. This itself brings about a health and safety issue. If we need to evacuate the site due to the dangerous chemicals we hold on the site, we would not be able to exit easily due to the obstructions. We have tanks full of very dangerous chemicals, we have had an incident where one tanker driver parked up Hallens Drive and the boy racers smashed his window screen because he had parked in the road they wanted to race on.
6. The boy racers also removed some of the road signs from the road in Hallens Drive.
7. With all the spectators along Hallens Drive there is always a large amount of litter left by the next day. It has a negative impact on the area especially to the police who visit our site.
8. We basically have a big problem every Sunday night due to the boy racers. It is business interruption that affects every aspect. The people we employ have made lots of complaints to us which then causes more work for us internally. The main thing for me is the verbal abuse my staff get from the boy racers and also the safety aspect of not being able to evacuate the site satisfactorily.
9. These issues are current still and have been going on for several years. It has been a constant problem for us and how nobody has been killed before now is beyond me.
10. With this statement I exhibit the G4S security report for the second of June 2014 [Exhibit]. This states that the security guard had problems with boy racers on that night.
11. We have made several complaints to the police service over the last few years. They have been able to have an impact on the boy races when they have been present to police the matter. However, as soon as the police go the boy racers return.
12. We are very keen for the issues of the boy racers to be removed from the area on Sunday evenings. We work in an industrial area suitable for our industry and we share it with other large companies such as Warburtons and Amazon. It is not designed for spectators and street racing.

STATEMENT OF TRUTH

I believe that the facts stated in this Witness Statement are true.

Full Name: David Philip Clark

Name of Claimant: Sandwell Metropolitan Borough Council

Signed _____

Print Name DAVID P CLARK

Dated 17/7/2014.

i) Statement of: David Phillip
Clarke
ii) Statement No: 2
iii) For: Claimants
iv) Dated: 17.07.2014
v) Exhibits: DPC1

**IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION**

CLAIM NO:

B E T W E E N:

**(1) WOLVERHAMPTON CITY COUNCIL
(2) DUDLEY METROPOLITAN BOROUGH COUNCIL
(3) SANDWELL METROPOLITAN BOROUGH COUNCIL
(4) WALSALL METROPOLITAN BOROUGH COUNCIL**

Claimants

and

PERSONS UNKNOWN

Defendants

EXHIBIT DPC1

**This is the document referred to as Exhibit DPC1 in the witness statement of
David Phillip Clarke dated 17.07.2014.**

Section 27 Direction to Leave - COPY

This form is a 2 part set

TT 5574702



Sections 30-36 of
Anti Social Behaviour Act
Security Officer Report

Customer name JOHNSON CONTROLS Assignment no W0359 Security Officer D.O. Austin Payroll no 817524

Day of week SUNDAY Date 22/06/14 Time 7:00 PM Hours of duty: From 7:00 PM To 7:00 AM

Handover <input checked="" type="checkbox"/> Keys/Key cards Other (specify) <u>CCTV</u>	Equipment in working order Security Officer Control System Yes/No Hand Torch Yes/No Other <u>PHONE</u> Yes/No	Fire, security and quality question nos Answers <u>4.2</u> <u>10</u>
--	---	---

I confirm that I have read and understood my assignment instructions and all current temporary instructions.

Time in	Emp. No.	Surname	Signature	Time in	Emp. No.	Surname	Signature
7:00 PM	817524	Austin	D.O. Austin				

Seq No.	Time	Duty Record	Initials
1	7:00 PM	DESMOND back on duty. LOCK MAIN GATE. -	D.O.A
2	8:30	PATROL THE SITE. WAREHOUSE TENT. BACK FENCE CHECK. -	D.O.A
-	-	CONTAINERS. CALORGASTANK. OFFICE IS CHECK.	D.O.A
3	8:50	RETURN TO BASE. OPEN MAIN GATE. OFFICE IS OPEN.	D.O.A
4	10:45	I HAVE TO CALL THE POLICE BOY RACERS BLOCK -	D.O.A
-	-	THE MAIN GATE. PATROL THE SITE. OFFICE IS CHECKING IN.	D.O.A
5	11:30	RETURN TO BASE. OPEN MAIN GATE.	D.O.A
6	-	AUTOMATIC LOCK NOT WORKING. MAINTENANCE INFORM.	D.O.A
7	1:20	LOCK MAIN GATE. PATROL THE SITE. OFFICE IS CHECK.	D.O.A
8	1:40	RETURN TO BASE. OPEN MAIN GATE.	D.O.A
9	2:30	PATROL THE SITE. OFFICE IS CHECK. OFFICE DOORS FALTY	D.O.A
10	2:50	RETURN TO BASE. PATROL THE SITE. OFFICE IS CHECK. -	D.O.A
11	3:30	OFFICE IS DOORS RESET. UNLOCK CONFERENCE ROOM.	D.O.A
12	3:50	RETURN TO BASE. OPEN MAIN GATE. ALL IS WELL.	D.O.A
13	7:00 AM	DESMOND off duty.	D.O.A

i) Statement of: Pardip Nagra
ii) Statement No: 1
iii) For: Claimants
iv) Dated: 19.07.2022
v) Exhibits: PN1 – PN19

**IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION**

CLAIM NO:

B E T W E E N:

**(1) WOLVERHAMPTON CITY COUNCIL
(2) DUDLEY METROPOLITAN BOROUGH COUNCIL
(3) SANDWELL METROPOLITAN BOROUGH COUNCIL
(4) WALSALL METROPOLITAN BOROUGH COUNCIL**

Claimants

and

PERSONS UNKNOWN

Defendants

EXHIBIT PN4: A NOTE REGARDING "EXHIBIT DPC1"

David Philip Clark Health and Safety Coordinator at Johnson Controls, Hallens Drive, Wednesbury, provided the Claimants with video footage exhibited to his witness statement dated 12.03.2014 for the purposes of the Claimants' injunction application to restrain "car cruising" within the Black Country (which was heard by the High Court and granted on 1 December 2014). The video footage was captured on 7 October 2011 and was exhibited to Mr Clark's Statement dated 12.03.2014 marked as "**Exhibit DPC1**".

Whilst the Claimants' recollection is that this video footage was available to the Court in December 2014, in the intervening years the Claimants have, unfortunately, lost the video footage that was Exhibit DPC1.

i) Statement of: Pardip Nagra
ii) Statement No: 1
iii) For: Claimants
iv) Dated: 19 July 2022
v) Exhibits: PN1-PN19

**IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION**

CLAIM NO:

B E T W E E N:

**(1) WOLVERHAMPTON CITY COUNCIL
(2) DUDLEY METROPOLITAN BOROUGH COUNCIL
(3) SANDWELL METROPOLITAN BOROUGH COUNCIL
(4) WALSALL METROPOLITAN BOROUGH COUNCIL**

Claimants

and

PERSONS UNKNOWN

Respondents

EXHIBIT PN5

This is the document referred to as "Exhibit PN5" in the witness statement of Pardip Nagra dated 19 July 2022.

- i) Statement of:
- ii) Statement No:
- iii) For:
- iv) Dated:
- v) Exhibits:

**IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION**

CLAIM NO:

B E T W E E N:

**(1) WOLVERHAMPTON CITY COUNCIL
(2) DUDLEY METROPOLITAN BOROUGH COUNCIL
(3) SANDWELL METROPOLITAN BOROUGH COUNCIL
(4) WALSALL METROPOLITAN BOROUGH COUNCIL**

Claimants

and

PERSONS UNKNOWN

Defendants

WITNESS STATEMENT OF LISA PARMAR

I, Lisa Parmar of [REDACTED] Short Street, Wednesbury, WILL SAY AS FOLLOWS:

1. I am Lisa Parmar of [REDACTED] Short Street, Wednesbury. I have lived at this address for 15 years.
2. I am employed by Wolverhampton City Council as a Neighbourhood Safety Co-ordinator covering the South East of the City. I have held this post for 13 years.
3. I am aware of the problems caused by 'car cruising' along the Black Country Route as this issue has been raised by residents attending Partners and Communities Together (PACT) meetings in Bilston East and Ettingshall and is also currently a live issue being discussed at the Ettingshall Neighbourhood Tasking meetings.
4. In a personal capacity, I have heard the noise when in my own property, predominantly on Sunday evenings over the past couple of years. There are

occasions when the car cruising has also taken place on Friday and Saturday evenings as well and continues until approximately 1.00am on some occasions. Whilst I hear more noise when the cruising is taking place in the Hallens Drive area I can also hear the noise when this is happening in the Moxley area mainly around the location of the Aldi supermarket.

5. On Sunday 18th May, noise associated with the car cruising was evident to me from approximately 10.00pm until approximately 12.30am.
6. My route into work takes me down Patent Drive and into Western Way. On Monday 19th May at approximately 9.50am as I travelled down Western Way approaching the traffic island, I noticed markings in the road. I travelled to my work location at 58 Bank Street, Bradley, Bilston. I dealt with a few matters in the office and returned to Hallens Drive at approximately 11.30am where I took 6 photographs. I sent these photographs to Joanne Mason, Wolverhampton Anti-social Behaviour Team Manager and Inspector Akeel Najib from Sandwell Local Policing Unit.
7. Exhibit shows a wall at the side of the road on Hallens Drive on the approach to the island. The street name has been painted over and the words 'Dreams Racing' and 'Bad Boys' has been painted onto the wall.
8. Exhibit shows markings on the road - '30 MAX. SLOW DO..'. These markings are on the road as the island is approached from Hallens Drive.
9. Exhibit is the same location but taken from a slightly different angle to show more of the words that had been sprayed, which are 'SLOW DOWN. DRIFTING AHEAD ↑'.
10. Exhibit shows the 'start' line that has been painted on the entry into Hallens Drive from the island.
11. Exhibit is painted on the road in between the exit from Patent Drive and the entry into Hallens Drive. The markings are 'MAX SPEED 150'.
12. Exhibit shows 'FUCK THE PIGS' which was painted on the pavement.

13. All of the above have been identified on an aerial view of the area [Exhibit].

STATEMENT OF TRUTH

I believe that the facts stated in this Witness Statement are true.

Full Name: Lisa Parmar

Name of Claimant: Sandwell Metropolitan Borough Council

Signed L. Parmar

Print Name LISA PARMAR

Dated 22/5/14

i) Statement of: Lisa Parmer
ii) Statement No: 1
iii) For: Claimants
iv) Dated: 22/05/2014
v) Exhibits: LP1-LP7

**IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION**

CLAIM NO:

B E T W E E N:

**(1) WOLVERHAMPTON CITY COUNCIL
(2) DUDLEY METROPOLITAN BOROUGH COUNCIL
(3) SANDWELL METROPOLITAN BOROUGH COUNCIL
(4) WALSALL METROPOLITAN BOROUGH COUNCIL**

Claimants

and

PERSONS UNKNOWN

Defendants

EXHIBIT LP1

**This is the document referred to as Exhibit LP1 in the witness statement of
Lisa Parmer dated 22.05.2014**



DREAMS

BOYS

i) Statement of: Lisa Parmer
ii) Statement No: 1
iii) For: Claimants
iv) Dated: 22/05/2014
v) Exhibits: LP1-LP7

**IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION**

CLAIM NO:

B E T W E E N:

**(1) WOLVERHAMPTON CITY COUNCIL
(2) DUDLEY METROPOLITAN BOROUGH COUNCIL
(3) SANDWELL METROPOLITAN BOROUGH COUNCIL
(4) WALSALL METROPOLITAN BOROUGH COUNCIL**

Claimants

and

PERSONS UNKNOWN

Defendants

EXHIBIT LP2

**This is the document referred to as Exhibit LP2 in the witness statement of
Lisa Parmer dated 22.05.2014**



i) Statement of: Lisa Parmer
ii) Statement No: 1
iii) For: Claimants
iv) Dated: 22/05/2014
v) Exhibits: LP1-LP7

**IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION**

CLAIM NO:

B E T W E E N:

**(1) WOLVERHAMPTON CITY COUNCIL
(2) DUDLEY METROPOLITAN BOROUGH COUNCIL
(3) SANDWELL METROPOLITAN BOROUGH COUNCIL
(4) WALSALL METROPOLITAN BOROUGH COUNCIL**

Claimants

and

PERSONS UNKNOWN

Defendants

EXHIBIT LP3

**This is the document referred to as Exhibit LP3 in the witness statement of
Lisa Parmer dated 22.05.2014**



i) Statement of: Lisa Parmer
ii) Statement No: 1
iii) For: Claimants
iv) Dated: 22/05/2014
v) Exhibits: LP1-LP7

**IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION**

CLAIM NO:

B E T W E E N:

**(1) WOLVERHAMPTON CITY COUNCIL
(2) DUDLEY METROPOLITAN BOROUGH COUNCIL
(3) SANDWELL METROPOLITAN BOROUGH COUNCIL
(4) WALSALL METROPOLITAN BOROUGH COUNCIL**

Claimants

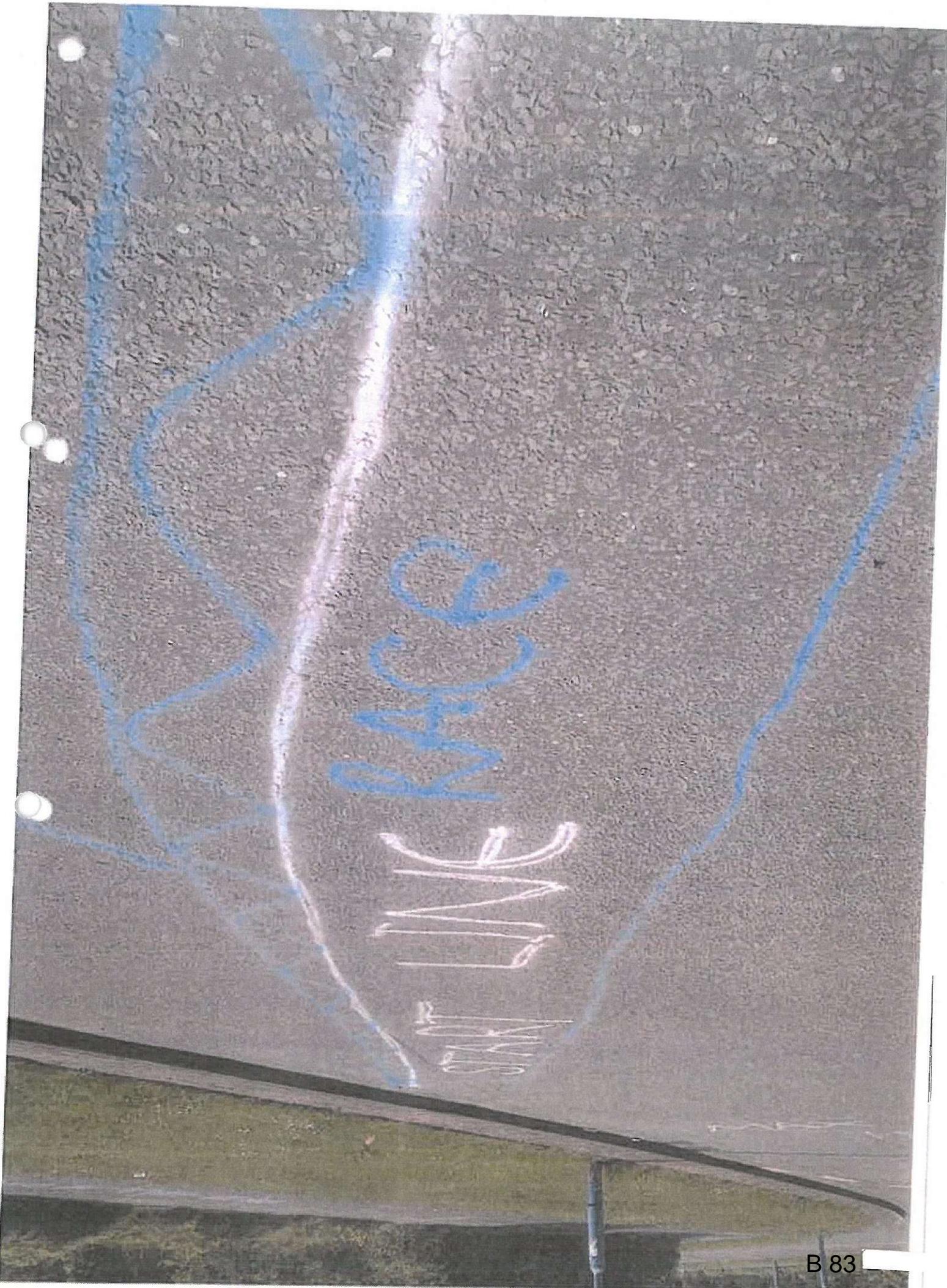
and

PERSONS UNKNOWN

Defendants

EXHIBIT LP4

**This is the document referred to as Exhibit LP4 in the witness statement of
Lisa Parmer dated 22.05.2014**



i) Statement of: Lisa Parmer
ii) Statement No: 1
iii) For: Claimants
iv) Dated: 22/05/2014
v) Exhibits: LP1-LP7

**IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION**

CLAIM NO:

B E T W E E N:

**(1) WOLVERHAMPTON CITY COUNCIL
(2) DUDLEY METROPOLITAN BOROUGH COUNCIL
(3) SANDWELL METROPOLITAN BOROUGH COUNCIL
(4) WALSALL METROPOLITAN BOROUGH COUNCIL**

Claimants

and

PERSONS UNKNOWN

Defendants

EXHIBIT LP5

**This is the document referred to as Exhibit LP5 in the witness statement of
Lisa Parmer dated 22.05.2014**



i) Statement of: Lisa Parmer
ii) Statement No: 1
iii) For: Claimants
iv) Dated: 22/05/2014
v) Exhibits: LP1-LP7

**IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION**

CLAIM NO:

B E T W E E N:

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(2) DUDLEY METROPOLITAN BOROUGH COUNCIL
(3) SANDWELL METROPOLITAN BOROUGH COUNCIL
(4) WALSALL METROPOLITAN BOROUGH COUNCIL**

Claimants

and

PERSONS UNKNOWN

Defendants

EXHIBIT LP6

**This is the document referred to as Exhibit LP6 in the witness statement of
Lisa Parmer dated 22.05.2014**

i) Statement of: Lisa Parmer
ii) Statement No: 1
iii) For: Claimants
iv) Dated: 22/05/2014
v) Exhibits: LP1-LP7

**IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION**

CLAIM NO:

B E T W E E N:

**(1) WOLVERHAMPTON CITY COUNCIL
(2) DUDLEY METROPOLITAN BOROUGH COUNCIL
(3) SANDWELL METROPOLITAN BOROUGH COUNCIL
(4) WALSALL METROPOLITAN BOROUGH COUNCIL**

Claimants

and

PERSONS UNKNOWN

Defendants

EXHIBIT LP7

**This is the document referred to as Exhibit LP7 in the witness statement of
Lisa Parmer dated 22.05.2014**

Exhibit 5 road markings on approach to stair way.

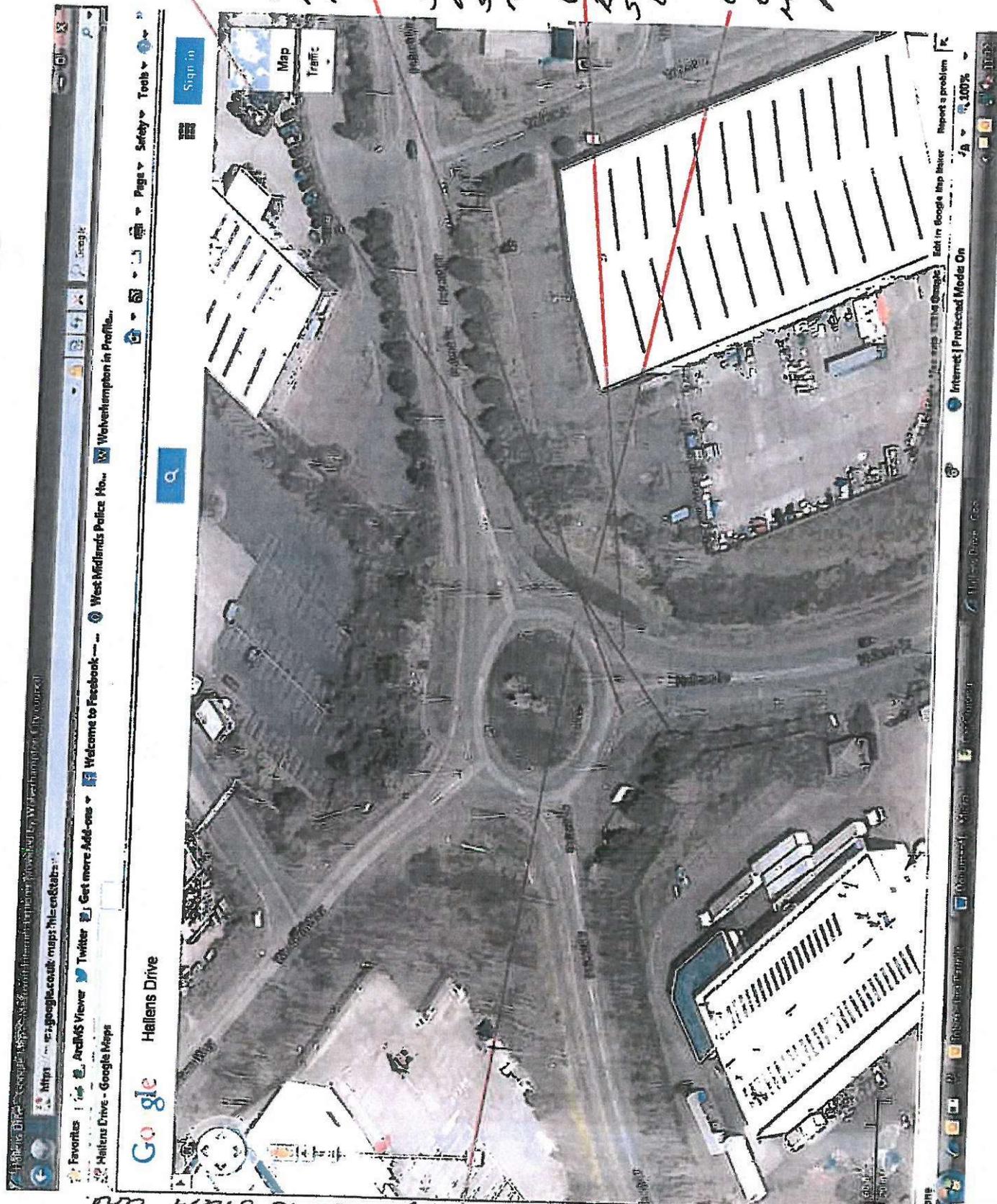


Exhibit 1
Graffiti
and road sign
painted over

Exhibit 2
Markings in
road, 130 max

Exhibit 3
Same location
as Exhibit 2
Showing more
road marking

Exhibit 4
Road markings
showing start
line.

Exhibit 6
Offensive
marking on
pavement.

i) Statement of: Pardip Nagra
ii) Statement No: 1
iii) For: Claimants
iv) Dated: 19 July 2022
v) Exhibits: PN1-PN19

**IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION**

CLAIM NO:

B E T W E E N:

**(1) WOLVERHAMPTON CITY COUNCIL
(2) DUDLEY METROPOLITAN BOROUGH COUNCIL
(3) SANDWELL METROPOLITAN BOROUGH COUNCIL
(4) WALSALL METROPOLITAN BOROUGH COUNCIL**

Claimants

and

PERSONS UNKNOWN

Respondents

EXHIBIT PN6

This is the document referred to as "Exhibit PN6" in the witness statement of Pardip Nagra dated 19 July 2022.

i) Statement of: Lydia Pulford
ii) Statement No: 1
iii) For: Claimants
iv) Dated: 11.11.2013
v) Exhibits: -

IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION

CLAIM NO:

B E T W E E N:

(1) WOLVERHAMPTON CITY COUNCIL
(2) DUDLEY METROPOLITAN BOROUGH COUNCIL
(3) SANDWELL METROPOLITAN BOROUGH COUNCIL
(4) WALSALL METROPOLITAN BOROUGH COUNCIL

Claimants

and

PERSONS UNKNOWN

Defendants

WITNESS STATEMENT OF LYDIA PULFORD

I, Lydia Pulford, of [REDACTED] Holyhead Road, Wednesbury, WS10 7DQ, WILL SAY AS FOLLOWS:

1. I am a resident living at the above address where I have lived for approximately two years and I live with my partner.
2. When I got here with my partner we started going for walks in the evenings. We would go any evening until we went walking on a Sunday evening when we experienced the boy racers.
3. Our walk consists of going from the island at the A41 Black Country New Road with Patent Drive. From there we would walk down Patent Drive to the next island, left there onto Hallens Drive. We would continue along until the next island, still in Hallens Drive and continue on past Fitness First to Patent Shaft island, again at the A41 Black Country New Road. Basically it's a circular route.

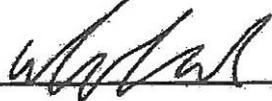
4. From living in the area for the last two years I know that the boy racers use Hallens Drive and Patent Drive to race and meet up. Patent Drive and Hallens Drive are very wide, single carriageway roads with a 30 mph speed limit.
5. Going back to the first Sunday evening when we decided to go for a walk we started to walk down Patent Drive from the A41 Island (downhill) towards Hallens Drive island and completed our circular walk. It was about 16:00-17:00 hours; it was still daylight. As we came out onto the A41 by Fitness First we continued up the A41 on the left hand side. I heard some noisy cars coming up the road from behind us so I remember turning round. There were about six cars in total, they were boy racers because I remember the cars having tinted windows, lowered suspension, etc. They were all small cars like Saxos or Clios.
6. As they drove past I could see that the cars were carrying 4-5 people and each car had their windows down and I remember that one of them was leaning out of the window and we were shouted at in an aggressive manner by this person hanging out of the car. This really took me back and shocked me; to be honest it scared me even though I was with my partner. I think the reason this person shouted was to frighten us and to show off to his mates who were behind them.
7. I have been present in a car as a passenger in Hallens Drive when the boy racers had met on a Sunday evening. This was about 12 months ago. I found it very intimidating because there were mini-motorbikes, cars (lots of them), people all stood at the side of the road watching us and videoing with their phones. It was just horrible. There were hundreds of people and cars parked along Hallens Drive and also up into Moorcroft.
8. Nowadays if it's a Sunday we just don't drive down there and certainly don't walk, so it's correct to say that the boy racers gathering and meeting there has affected how we plan our recreation (walking).

STATEMENT OF TRUTH

I believe that the facts stated in this Witness Statement are true.

Full Name: Lydia Pulford

Name of Claimant: Sandwell Metropolitan Borough Council

Signed 

Print Name L. PULFORD

Dated 11 / 11 / 13

i) Statement of: Pardip Nagra
ii) Statement No: 1
iii) For: Claimants
iv) Dated: 19 July 2022
v) Exhibits: PN1-PN19

**IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION**

CLAIM NO:

B E T W E E N:

**(1) WOLVERHAMPTON CITY COUNCIL
(2) DUDLEY METROPOLITAN BOROUGH COUNCIL
(3) SANDWELL METROPOLITAN BOROUGH COUNCIL
(4) WALSALL METROPOLITAN BOROUGH COUNCIL**

Claimants

and

PERSONS UNKNOWN

Respondents

EXHIBIT PN7

This is the document referred to as "Exhibit PN7" in the witness statement of Pardip Nagra dated 19 July 2022.

- i) Statement of: F Bird
- ii) Statement No: 1
- iii) For:
- iv) Dated: 23.11.14
- v) Exhibits:

IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION

CLAIM NO: A90BM228

BETWEEN:

(1) WOLVERHAMPTON CITY COUNCIL
(2) DUDLEY METROPOLITAN BOROUGH COUNCIL
(3) SANDWELL METROPOLITAN BOROUGH COUNCIL
(4) WALSALL METROPOLITAN BOROUGH COUNCIL

Claimants

and

PERSONS UNKNOWN

Defendants

WITNESS STATEMENT OF FENELLA BIRD

I, Fenella Bird of ■■■ St Jude's Road West, Wolverhampton WV6 0TA ,
WILL SAY AS FOLLOWS:

1. I am Fenella Bird and I live at the above address.
2. This statement relates to a frightening experience involving boy racers on the Black Country Route which occurred

on Sunday 16th November 2014 at about 22:20 hours when I was travelling from Bilston along the Black Country Route towards Birmingham New Road.

3. At the time of this incident I was on my own driving my silver Toyota Yaris. On approaching the Black Country Route near the Halfords island, I suddenly became aware of a large group of people standing on the pavement near the island. On exiting the island continuing on my journey I suddenly saw to my right about 5 or 6 cars at speed on the outer carriageway racing and also a vehicle behind me approach with full beam headlights on. This vehicle behind me frightened me so I put my hazard lights on and slowed immediately.
4. At this point I was very scared and started to look for somewhere to park. I again saw lots of further people standing on the road side to my left which was the entrance to SMA Car Auctions. I felt threatened and confused by this vehicle behind me so I turned left into the car auction car park and called the police about the people and car racing on the Black Country Route. I was physically shaking and petrified from this experience which was frightening and horrid.
5. I made the call to the police and waited a few minutes. In that time the crowd in the entrance to the car auction quickly dispersed. I continued on my journey and came to the next exit island which is Sedgemoor Park. I saw a police marked vehicle with its blue lights flashing dealing with one of the vehicles on the Black Country Route.

6. This was a terrible experience which I do not want to go through again. I have been driving for 25 years and have never seen an incident like this before.

7. I have been informed by the police that an injunction is to be asked for later this year in an attempt to stop this happening on public roads. I would support any legal preventative measures that the police take to stop this illegal activity.

STATEMENT OF TRUTH

I believe that the facts stated in this Witness Statement are true.

Full Name: Fenella Bird

Name of Claimant: Wolverhampton Metropolitan Borough Council

Signed FABird.

Print Name FENELLA BIRD.

Dated 23-11-2014.

i) Statement of: Pardip Nagra
ii) Statement No: 1
iii) For: Claimants
iv) Dated: 19 July 2022
v) Exhibits: PN1-PN19

**IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION**

CLAIM NO:

B E T W E E N:

**(1) WOLVERHAMPTON CITY COUNCIL
(2) DUDLEY METROPOLITAN BOROUGH COUNCIL
(3) SANDWELL METROPOLITAN BOROUGH COUNCIL
(4) WALSALL METROPOLITAN BOROUGH COUNCIL**

Claimants

and

PERSONS UNKNOWN

Respondents

EXHIBIT PN8

This is the document referred to as "Exhibit PN8" in the witness statement of Pardip Nagra dated 19 July 2022.

i) Statement of: PC. Jonathan Harford
ii) Statement No: 1
iii) For: Claimant
iv) Dated: 16.11.2013
v) Exhibits: -

IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION

CLAIM NO:

BETWEEN:

(1) WOLVERHAMPTON CITY COUNCIL
(2) DUDLEY METROPOLITAN BOROUGH COUNCIL
(3) SANDWELL METROPOLITAN BOROUGH COUNCIL
(4) WALSALL METROPOLITAN BOROUGH COUNCIL

Claimants

and

PERSONS UNKNOWN

Defendants

WITNESS STATEMENT OF JOHNATHAN PHILIP HARFORD

I, PC 20135 Harford of West Midlands Police, WILL SAY AS FOLLOWS:

1. I am PC 20135 Harford of West Midlands Police, currently stationed at Bilston Police Station, Railway Street, Bilston, West Midlands.
2. On Sunday 10th March 2013 at approx. 21:30 hours I was on uniformed mobile patrol with PC 20218 Dove when we attended the Black Country Route, Bilston, Wolverhampton to the report of a number of vehicles at the location speeding and racing along the road.
3. We arrived on the Black Country Route and drove up to the Springvale Retail Park where intelligence from previous incidents suggested the cars were gathering. We arrived at the industrial estate and I could see a number of vehicles gathered on the road at the entrance to the retail park called Springvale Way. They were all parked up and at no stage on this occasion did I witness any of the vehicles speeding. Some of the occupants of the vehicles were standing outside and talking to each other.

4. There appeared to be more than twenty vehicles gathered at the location. The vehicles were of all makes and models and some appeared to be modified with alloy wheels and different exhaust systems.
5. I was joined by other officers at the scene and, because of the problems with vehicles speeding along the Black Country Route that had occurred in the previous weeks, a decision was taken to record the details of all the vehicles and occupants present at the scene.
6. As we began to record the details I became aware of a road traffic collision that had occurred between two of the vehicles on Springvale Way. I did not witness the collision occur but as I walked over to the occupants of the vehicles I could see they were discussing the matter and pointing at the minor damage caused to the bodywork of the vehicles. The two vehicles involved were a Blue Peugeot 207, VRM J6YLB and a Red Ford Fiesta, VRM SL08 WWG. Both of the drivers exchanged vehicle and insurance details and then left the scene. No persons were injured during the collision.
7. Following on from this all of the vehicles and occupants at the gathering then left the scene after their details had been recorded by the police officers in attendance.

STATEMENT OF TRUTH

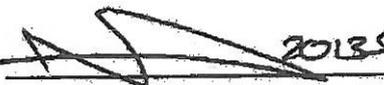
I believe that the facts stated in this Witness Statement are true.

Full Name: Johnathan Philip Harford

Position: Police Constable

Name of Claimant: Wolverhampton City Council

Signed

 20135

Print Name JOHNATHAN PHILIP HARFORD

Dated

16/11/13

i) Statement of: Pardip Nagra
ii) Statement No: 1
iii) For: Claimants
iv) Dated: 19 July 2022
v) Exhibits: PN1-PN19

**IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION**

CLAIM NO:

B E T W E E N:

**(1) WOLVERHAMPTON CITY COUNCIL
(2) DUDLEY METROPOLITAN BOROUGH COUNCIL
(3) SANDWELL METROPOLITAN BOROUGH COUNCIL
(4) WALSALL METROPOLITAN BOROUGH COUNCIL**

Claimants

and

PERSONS UNKNOWN

Respondents

EXHIBIT PN9

This is the document referred to as "Exhibit PN9" in the witness statement of Pardip Nagra dated 19 July 2022.

i) Statement of: *Richard Hardy*
ii) Statement No: 1
iii) For: *Claimants*
iv) Dated: *06.11.2013*
v) Exhibits: -

IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION

CLAIM NO:

BETWEEN:

(1) WOLVERHAMPTON CITY COUNCIL
(2) DUDLEY METROPOLITAN BOROUGH COUNCIL
(3) SANDWELL METROPOLITAN BOROUGH COUNCIL
(4) WALSALL METROPOLITAN BOROUGH COUNCIL

Claimants

and

PERSONS UNKNOWN

Defendants

WITNESS STATEMENT OF RICHARD HARDY

I, Richard Hardy of [REDACTED] Aldridge Road, Little Aston, Walsall, West Midlands, WS9 0PE, WILL SAY AS FOLLOWS:

1. I am a resident living at the above address.
2. I am the Managing Director of K R Harding Estates Limited who own a large number of properties situated along Brickyard Road and also Empire Industrial Estate, as well as Aldridge Marina – this being a canal boat mooring facility – residential. The following statement relates to gatherings of nuisance vehicles along Brickyard Road, Aldridge.
3. Brickyard Road is the main road that services the above and is also used as a cut through connecting road towards the A461 Lichfield Road. It has a 30 mph speed limit and, as stated, is mainly industrial but also has a small number of residential premises.

4. In my position of owner and landlord I can state that I receive numerous complaints and have personally witnessed on numerous occasions the behaviour of these gatherings over a prolonged period.
5. I would associate the nuisance to be concerned with street racing along the length of Brickyard Road and the behaviour of the persons that this attracts.
6. On these occasions, large numbers of young motorists, that are referred to as "Boy Racers", gather on the communal areas of car parks and factory frontages.
7. This alone creates its own problems regarding litter and on many occasions using the area as a toilet, urinating in the buildings' porches and covered areas.
8. There is also debris left from any damage that has been caused to their own vehicles, the car parks and the buildings, together with oil spillages.
9. We have the continual job of cleaning up general refuse of empty cans, foil wrappers, cigarette packets and other litter following such meetings from the various areas of our estate and disinfecting areas which is unwelcome and adds up to being a costly expense.
10. In addition to the above, street racing occurs along the length of the roadway. At such times "look-outs" have been seen posted at each end of the road and the racing of cars occurs, usually two a breast, utilising both lanes of the road in one direction at the same time.
11. On numerous occasions the private fencing and walls to the junction of Brickyard Road and Northgate Way has suffered damage by the racing vehicles being unable to stop. A private motorway tyre barrier has been installed which itself has suffered damage.
12. We have had to go to the expense of fencing off our own entrance yard at Empire House with costly fencing and gates to prevent the congregating of the vehicles and spectators.

13. This practice is creating a dangerous activity which is quite likely to result in injury to innocent victims who would not be expecting to meet two cars travelling towards them at speed, with at least one in the wrong direction of travel.
14. Other premises have also had to use some form of physical barrier(s) being gates or chains across their entrances which have subsequently been damaged.
15. Our canal boat moorers who live adjacent to the Aldridge Marina boatyard suffer noise nuisance in respect of highly revving engines and tyre screeching which is very annoying to them.
16. Access to properties along Brickyard Road during such "race meetings" is also restricted due to the potential dangers of such events.
17. I wish to complain regarding this matter, and can also, as stated, complain on behalf of my tenants, both residential and commercial.

STATEMENT OF TRUTH

I believe that the facts stated in this Witness Statement are true.

Full Name: Richard Hardy

Name of Claimant: Walsall Metropolitan Borough Council

Signed Richard Hardy

Print Name RICHARD HARDY.

Dated 6TH NOVEMBER 2013.

i) Statement of: Pardip Nagra
ii) Statement No: 1
iii) For: Claimants
iv) Dated: 19 July 2022
v) Exhibits: PN1-PN19

**IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION**

CLAIM NO:

B E T W E E N:

**(1) WOLVERHAMPTON CITY COUNCIL
(2) DUDLEY METROPOLITAN BOROUGH COUNCIL
(3) SANDWELL METROPOLITAN BOROUGH COUNCIL
(4) WALSALL METROPOLITAN BOROUGH COUNCIL**

Claimants

and

PERSONS UNKNOWN

Respondents

EXHIBIT PN10

This is the document referred to as "Exhibit PN10" in the witness statement of Pardip Nagra dated 19 July 2022.

i) Statement of: Police Inspector Julie Mason

ii) Statement No:

iii) For:

iv) Dated:

v) Exhibits:

**IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION**

CLAIM NO:

B E T W E E N:

**(1) WOLVERHAMPTON CITY COUNCIL
(2) DUDLEY METROPOLITAN BOROUGH COUNCIL
(3) SANDWELL METROPOLITAN BOROUGH COUNCIL
(4) WALSALL METROPOLITAN BOROUGH COUNCIL**

Claimants

and

PERSONS UNKNOWN

Defendants

WITNESS STATEMENT OF INSPECTOR 5945 JULIE MASON

I, Inspector 5945 Mason of the West Midlands Police, WILL SAY AS FOLLOWS:

1. I am Inspector 5945 Mason of the West Midlands Police currently stationed at Dudley.
2. I have been made aware of issues of car cruising within the Dudley Policing area and although other areas have been targeted, incidents reported in Flood Street car parks in Dudley Town Centre have been the most serious.
3. Since the end of 2011, mainly on Sunday evenings, we have experienced large groups of vehicles and pedestrian onlookers congregating on Flood Street car parks with between 50 and a few hundred vehicles at any one time. Some of these vehicles have committed various offences including driving at excessive speed and dangerous driving on both the roads and car parks with some incidents witnessed by the Police. In addition we and the Council had noise, anti-social behaviour and

litter to contend with and as a result received various complaints from members of the public.

4. Police logs from 6 August 2012 to 6 June 2013 relating to complaints about boy racers are detailed below.
5. Police log 6 August 2012: 50 – 70 cars have met up on Flood Street car park and are racing around.
6. Police log 1 October 2012: In excess of 100 cars have gathered at Floor Street car park, revving of engines.
7. Police log 12 October 2012: Birmingham New Road – ASB driving, speeding, throwing bottles at cars.
8. Police log 28 October 2012: Excess of 200 cars at Flood Street.
9. 2 x Police logs 28 October 2012: Loads of boy racers at car park New Mill Street – it's gridlocked.
10. Police log 5 November 2012: In excess of 60 cars racing around island at New Mill Street/Flood Street.
11. Police log 14 November 2012: Cars blocking road by King Arthur public house.
12. Police log 14 November 2012: Traffic chaos at Birmingham New Road A4123/Priory Road Foxyard. 2 x vehicles have their hazard lights on in the filter lane with their engines running.
13. Police log 3 December 2012: 100 – 150 boy racers on Flood Street car park.
14. Police log 3 December 2012: 2 x calls reporting approximately 250 boy racers at Oakeywell Street, Dudley driving at ridiculous speed around car park and up and down dual carriageway.

15. Police log 7 January 2013: 3 x boy racers in road traffic accident. 2 vehicles failed to stop. Vehicles collided after leaving Flood Street car park. Excess of 100 vehicles at Flood Street.
16. Police log 7 January 2013: In excess of 150 boy racers on Floor Street car park. Organised meet with Japanese cars owners club as advertised on Facebook.
17. Police log 20 January 2013: Two cars blocking road side by side with hazards on.
18. Police log 20 January 2013: Loads of cars have pulled up alongside each other on the hill at Blowers Green Road, Dudley and all talking to each other and blocking the road.
19. Police log 13 March 2013: Erratic driving from boy racer on Castle Hill, Dudley.
20. Police log 24 March 2013: 150 vehicles at Flood Street.
21. Police log 7 April 2013: 50/60 modified cars racing around Flood Street car park and nearby roads.
22. Police log 14 April 2013: 20 boy racers at Birmingham New Road/Sedgley Road West – caller says this happens every week.
23. Police log 28 April 2014: 2 x calls of 200 boy racers racing on underground car park at Tesco Burnt Tree. Cars doing doughnuts and speeding.
24. Police log 28 April 2014: Approximately 100 boy racers gathering at Flood Street car park.
25. Police log 28 April 2014: Boy racers coming down from Castle Gate island, spinning around at the junction.
26. Police log 16 June 2013: Flood Street, Dudley, modified vehicles with big wheels, exhausts, speeding in groups of 4 – 5, doing 70-80 mph on 40 mph road.
27. Police log 16 June 2013: boy racers racing at Beans Road, Tipton.

28. There is also a new housing development currently under construction adjacent to Flood Street which will be severely impacted upon should these events be allowed to continue.
29. There was no named organiser with events being organised through social media and because of the uncertainty of when they might occur we had no way of gauging an appropriate response.
30. In addition to this we had a group of Japanese car enthusiasts known as the JDM collective congregating on the Flood Street car parks on Sunday evenings once a month with up to 400 cars attending at any one time. This group advertised their meetings via social media and their own website jdmcollective.co.uk. They were very organised with a named co-ordinator, professional photographers, vendors selling refreshments and their own marshalls who would only let Japanese car owners onto the car parks.
31. The organiser accepted that his event was attracting additional 'car cruisers' who were coming to and from the event along public roads and blatantly disregarding the law. He is currently seeking a private location for his meetings.
32. Various policing tactics have been utilised to tackle the issues but experience has shown that enforcement of the Road Traffic Act will deal with a small number of offenders but will not stop in my view the large numbers congregating. To deal with these large numbers we would need a large number of officers which is clearly not sustainable.
33. We have previously deployed a large number of officers which has prevented most of the activity in the area but this has then led to us pushing the problem over to another policing area. Providing a small number of officers has simply been ineffective in addressing issues affecting the wider road network.
34. The Police have a variety of priorities that are severely affected by the redeployment of officers to police these events and there is a large cost implication that also needs to be considered.

35. As a medium term solution, Dudley Metropolitan Borough Council agreed to staff locking down the car parks each Sunday evening using barriers that were permanently fixed to the entrances/exits of the car parks. These barriers had been constructed several years ago due to previous car cruising issues.
36. This has worked very well for the last 5-6 months reducing incidents and enabling Police Officers to be more appropriately deployed but I am led to believe that this is not a long term measure. Together with this, other neighbouring Police areas have deployed a pro-active approach to car cruising.
37. Car cruising and the subsequent inappropriate use of public roads and car parks by car drivers, motorbike riders and onlookers has led to many serious incidents in the Dudley Borough and there have been several fatal and life changing collisions.
38. I have concerns that displacement from other Local Authority areas could cause significant issues if Dudley does not progress with an injunction application and our neighbouring authorities do. I believe that an injunction would be a powerful long term strategy that could, where appropriate, lead to enforcement. An injunction could deal with those meeting in large numbers in addition to those driving inappropriately.

STATEMENT OF TRUTH

I believe that the facts stated in this Witness Statement are true.

Full Name: Julie Mason

Position: Police Inspector

Name of Claimant: Dudley Metropolitan Borough Council

Signed  _____

Print Name J. MASON

Dated 23/7/14

i) Statement of: Pardip Nagra
ii) Statement No: 1
iii) For: Claimants
iv) Dated: 19 July 2022
v) Exhibits: PN1-PN19

**IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION**

CLAIM NO:

B E T W E E N:

**(1) WOLVERHAMPTON CITY COUNCIL
(2) DUDLEY METROPOLITAN BOROUGH COUNCIL
(3) SANDWELL METROPOLITAN BOROUGH COUNCIL
(4) WALSALL METROPOLITAN BOROUGH COUNCIL**

Claimants

and

PERSONS UNKNOWN

Respondents

EXHIBIT PN11

This is the document referred to as "Exhibit PN11" in the witness statement of Pardip Nagra dated 19 July 2022.

This is in fact video footage which is available separately.

i) Statement of: Pardip Nagra
ii) Statement No: 1
iii) For: Claimants
iv) Dated: 19 July 2022
v) Exhibits: PN1-PN19

**IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION**

CLAIM NO:

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(3) SANDWELL METROPOLITAN BOROUGH COUNCIL
(4) WALSALL METROPOLITAN BOROUGH COUNCIL**

Claimants

and

PERSONS UNKNOWN

Respondents

EXHIBIT PN12

This is the document referred to as "Exhibit PN12" in the witness statement of Pardip Nagra dated 19 July 2022.

From: Lisa Fox <foxlisa623@gmail.com>
Sent: 17 April 2021 23:43
To: Joanne Mason <Joanne.Mason@wolverhamptonhomes.org.uk>
Subject:

Hi jo.

Racing like mad at minute down black country route. Saturday 17th 23.30

From: Lisa Fox <foxlisa623@gmail.com>
Sent: 19 April 2021 09:08
To: Joanne Mason <Joanne.Mason@wolverhamptonhomes.org.uk>
Subject: Re:

Hi jo. They was racing again last night around midnight.

i) Statement of: Pardip Nagra
ii) Statement No: 1
iii) For: Claimants
iv) Dated: 19 July 2022
v) Exhibits: PN1-PN19

**IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION**

CLAIM NO:

B E T W E E N:

**(1) WOLVERHAMPTON CITY COUNCIL
(2) DUDLEY METROPOLITAN BOROUGH COUNCIL
(3) SANDWELL METROPOLITAN BOROUGH COUNCIL
(4) WALSALL METROPOLITAN BOROUGH COUNCIL**

Claimants

and

PERSONS UNKNOWN

Respondents

EXHIBIT PN13

This is the document referred to as "Exhibit PN13" in the witness statement of Pardip Nagra dated 19 July 2022.



BREAKING NEWS: West Midlands heatwave: Met Office's first ever red warning for extreme heat

Teenage police chase suspect released as investigation into Wolverhampton bike meet continues

By [Nathan Rowe](#) | [Bushbury](#) | [Crime](#) | Published: Apr 12, 2022

A teenager who was arrested after a stinger brought a police chase to an end has been released under investigation.

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The bike was written off in the crash

The chase ensued when two riders fled police at a bike meet in the Bushbury area of Wolverhampton on Sunday.

Two bikes at the organised meet failed to stop for officers and went on to run red lights, drive off road and weave in and out of cars during a police pursuit.

They were tracked by a police helicopter to Elston Hall Lane, one-and-a-half miles away, and brought to a halt by a stinger.

One of the bikers got away but one suspect, aged 17, was arrested after the bike he was allegedly riding crashed into a car.

He was arrested on suspicion of dangerous driving, theft of a motor vehicle, failing to stop and driving under the influence of drugs, but has since been released under investigation as further enquiries are carried out.

The teenager was not injured but police said the bike he was riding, which was allegedly stolen in Wolverhampton last month, was written off in the crash.

One local who said they saw the chase while driving through the area described the riders as "silly boys".

earlier they would have hit a car going around the island.

"We couldn't believe what we had just witnessed."

One other bike was arrested at the meet which was attended by around 40 people.

[Crime](#) [News](#) [Bushbury](#) [Wolverhampton](#) [Local Hubs](#)



By [Nathan Rowe](#)

Reporter - [@NRowe_Star](#)

Trainee reporter at the Express & Star.

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Express & Star

Teenage police chase suspect released as investigation into Wolverhampton bike meet continues

By Nathan Rowe Bushbury Crime Published: Apr 12, 2022

A teenager who was arrested after a stinger brought a police chase to an end has been released under investigation.



The bike was written off in the crash

The chase ensued when two riders fled police at a bike meet in the Bushbury area of Wolverhampton on Sunday.

Two bikes at the organised meet failed to stop for officers and went on to run red lights, drive off road and weave in and out of cars during a police pursuit.

They were tracked by a police helicopter to Elston Hall Lane, one-and-a-half miles away, and brought to a halt by a stinger.

One of the bikers got away but one suspect, aged 17, was arrested after the bike he was allegedly riding crashed into a car.

He was arrested on suspicion of dangerous driving, theft of a motor vehicle, failing to stop and driving under the influence of drugs, but has since been released under investigation as further enquiries are carried out.

The teenager was not injured but police said the bike he was riding, which was allegedly stolen in Wolverhampton last month, was written off in the crash.

One local who said they saw the chase while driving through the area described the riders as "silly boys".

Anna-Maria Sutton said: "My husband and I were waiting at a red light by the Chapel Ash island on the ring road when two bikes ran the red light at high speed, if they had been a few seconds earlier they would have hit a car going around the island.

"We couldn't believe what we had just witnessed."

One other bike was arrested at the meet which was attended by around 40 people.



By Nathan Rowe

Reporter@NRowe Star

Trainee reporter at the Express & Star

i) Statement of: Pardip Nagra
ii) Statement No: 1
iii) For: Claimants
iv) Dated: 19 July 2022
v) Exhibits: PN1-PN19

**IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION**

CLAIM NO:

B E T W E E N:

**(1) WOLVERHAMPTON CITY COUNCIL
(2) DUDLEY METROPOLITAN BOROUGH COUNCIL
(3) SANDWELL METROPOLITAN BOROUGH COUNCIL
(4) WALSALL METROPOLITAN BOROUGH COUNCIL**

Claimants

and

PERSONS UNKNOWN

Respondents

EXHIBIT PN14

This is the document referred to as "Exhibit PN14" in the witness statement of Pardip Nagra dated 19 July 2022.

To whom it may concern,

Regarding the Black Country Car Cruising Injunction, I wish for the following to be taken in to account:

I Councillor Linda Leach have served the Bilston North Ward as a Local Councillor since 2010.

Since I've been elected, I have received many complaints from concerned residents about Car Cruising.

The roads mainly affected are: Prouds Lane, Moseley Road, Green Park Avenue. Green lanes, Park View Road, Park Meadow Green, Worsley & Hadley Road & the Black Country route.

These roads are residential and also contain primary schools (Prouds Lane, Green Park Avenue) as well as small shopping areas that residents and families shop at.

In recent years whilst the injunction was in place noise nuisance and ASB complaints dropped dramatically, however since the injunction was removed the complaints and concerns have risen.

Most of the complaints are around an evening on weekdays but also on weekends.

I am concerned that this is unfair to residents and affects their quality of life, particularly in the summer months when it can become unbearable but also, I am concerned at the risk posed to young people who often visit parks and open spaces as well as shops.

I am fully supportive of the re-introduction of an injunction to help enforce the ban on car cruising. I genuinely believe this would make our streets safer and uphold the quality of life that we should all be entitled to and expect.

Kind Regards

Linda

Councillor Linda Leach
Cabinet Member for Adults
Labour Councillor for Bilston North Ward


Linda.leach@wolverhampton.gov.uk

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ii) Statement No: 1
iii) For: Claimants
iv) Dated: 19 July 2022
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Claimants

and

PERSONS UNKNOWN

Respondents

EXHIBIT PN15

This is the document referred to as "Exhibit PN15" in the witness statement of Pardip Nagra dated 19 July 2022.



HOUSE OF COMMONS
LONDON SW1A 0AA



By Email to
Ms Sarah White
Anti Social Behaviour Team Leader
Wolverhampton Homes

Our Ref: PM28344

31 May 2022

Dear Sarah

Re: Car Cruising injunction.

I am very concerned about the car cruising across the region especially in my constituency. Before the injunction was received in 2014 I was regularly getting emails and letters from my constituents about the noise and nuisance from these young racers. When the injunction came into place the complaints mainly stopped.

Recently I have been receiving complaints mainly from constituents who live in Ettingshall Park that the car cruising has started again. I would support a new injunction so as to alleviate the nuisance to my constituents.

Yours sincerely,

Rt Hon Pat McFadden MP
Wolverhampton South East

Crescent House, Broad Street, Bilston, WV14 0BZ

Telephone: 020 7219 4036
or 01902 405762

Email: patrick.mcfadden.mp@parliament.uk
Facebook: [@patmcfaddenwolverhampton](https://www.facebook.com/patmcfaddenwolverhampton)
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(3) SANDWELL METROPOLITAN BOROUGH COUNCIL
(4) WALSALL METROPOLITAN BOROUGH COUNCIL**

Claimants

and

PERSONS UNKNOWN

Respondents

EXHIBIT PN16

This is the document referred to as "Exhibit PN16" in the witness statement of Pardip Nagra dated 19 July 2022.



NICOLA RICHARDS MP
WEST BROMWICH EAST

NICOLA.RICHARDS.MP@PARLIAMENT.UK

0121 553 6897

19 HIGH STREET
WEST BROMWICH

B70 6PJ

25 April 2022

To whom it may concern,

I am writing on behalf of my constituents in West Bromwich East to express my support for an injunction banning car cruising in the Black Country.

I hear regularly from many constituents about the issues they are experiencing with dangerous car cruising and street racing in my constituency. For example, the residents of Kenrick Way and the surrounding area in West Bromwich are regularly affected by noisy cars, large gatherings and dangerous driving on an evening. The events described to me by constituents are alarming, with clearly organised races taking place on West Bromwich's streets, with large numbers of spectators watching the race, and a well-oiled organisation working to frustrate the police's attempts to control this behaviour and evade arrest.

Since the expiration of the previous injunction, these issues have worsened and there is serious concern amongst residents and law enforcement that this could lead to a serious incident in the future involving drivers, spectators or innocent by-standers.

The issue is not just confined to West Bromwich either, with constituents in other areas of my constituency reporting excessive speeding, street racing and dangerous driving in Great Barr.

In total, 649 constituents of West Bromwich East have signed my petitions related to car cruising or speeding cars in the area, demonstrating that this is a significant issue that is affecting the day to day lives of my constituents.

An injunction would ensure our police have all available tools in the fight against this dangerous behaviour. On behalf of my constituents, I ask that you strongly consider granting an injunction.

Yours sincerely,

Nicola Richards MP
Member of Parliament for West Bromwich East

From The Black Country. For The Black Country.

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ii) Statement No: 1
iii) For: Claimants
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Claimants

and

PERSONS UNKNOWN

Respondents

EXHIBIT PN17

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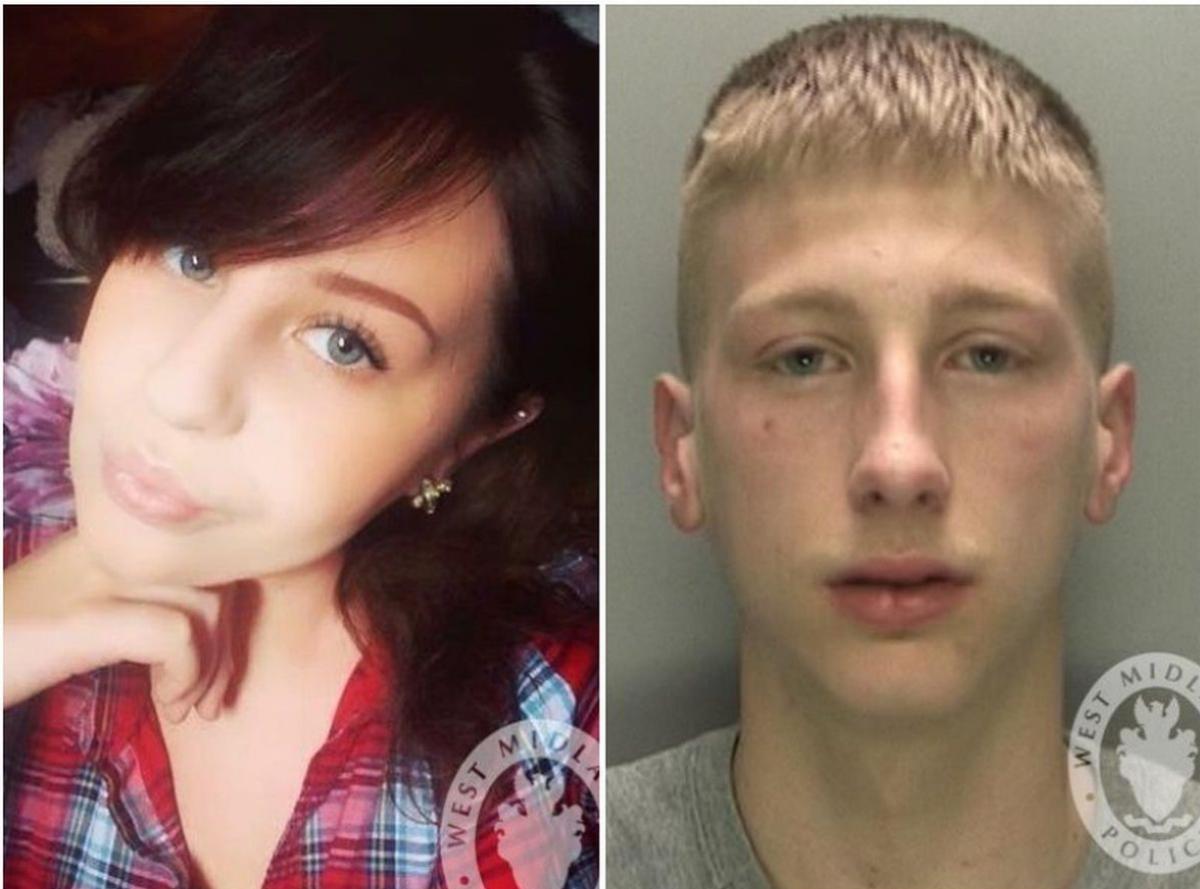
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Express & Star

Ellie Underhill: Seven-year sentence for driver after car bonnet fall death

By [Marion Brennan](#) [Dudley Crime](#) Published: Aug 15, 2018 Last Updated: Aug 15, 2018 [9 Comments](#)

Ellie Underhill died days after falling from the bonnet of a car driven outside Tesco Extra in Dudley on Boxing Day 2016



Ellie Underhill, and right, Luke Hickman

A teenager who caused the death of a friend when she was thrown from the bonnet of his car outside a supermarket as a prank has been locked up for almost eight years.

Luke Hickman drove at speeds of 30-40mph with Ellie Underhill clinging on to the windscreen wipers until a handbrake turn sent her hurtling to the ground, causing extensive head injuries, a court heard.

But instead of calling an ambulance or taking her to nearby Russells Hall Hospital, Hickman, 19, and two others drove her to a McDonald's further away where they tried to clean her up with tissue.

It was not until an hour and 13 minutes after the incident on Boxing Day 2016 that Miss Underhill was admitted to hospital.

She died from her injuries in hospital a few days later.



Left to right: Ross Bingham, Elly Phillips and Hana Edwards

Staff were told she had fallen after drinking, with 19-year-old Elly Phillips doing most of the talking, said prosecutor Mr Robert Price.

Hickman, Phillips and Ross Bingham, 21, who had all been at the Tesco Extra car park on Birmingham Road in Dudley that night, then went to Miss Underhill's home in Brierley Hill to tell her parents she was in hospital, Stoke on Trent Crown Court heard.

West Midlands Police said that the group repeatedly lied to the family and even visited Ellie's family on several occasions over a number of days.

The friends even accompanied Ellie's brother to show him where Ellie had allegedly fallen.

However the pressure got too much for them and, over a week after the incident, Bingham opened up to her brother to reveal exactly what had happened.

The family appealed for information on social media and on January 5 Phillips and Bingham were arrested.

When asked why it took so long to get her to hospital, police say Hickman made up an excuse that he was doing a drugs 'drop off'.

Hickman's girlfriend Hana Edwards, 19, texted him to warn him to delete his messages.

Sentences

Hickman, of Wassell Road, Wollescote, Stourbridge, admitted causing death by dangerous driving and a further count of dangerous driving and associated charges on June 6.

Phillips, of Seymour Road, Wollescote; Bingham, of Hagley Road, Edgbaston, and Hickman admitted conspiracy to pervert the course of justice.

These three were sentenced on Tuesday.

Hickman was sentenced to seven years and 10 months in a young offender's institution, Phillips got six months in a young offender's institution, while Edwards of Grove Road, Wollescote, was given an 18-month community order and 150 hours of unpaid work after admitting perverting the course of justice.

Bingham was sentenced to four months in prison on Wednesday.

'A loving and vibrant life'

The family of Ellie have paid tribute to their daughter, "We have waited since the 26 December 2016 for this day and no matter what the sentence is, justice will never be served.

"Contrary to reports in the media, we as her family would like it to be known that none of the defendants informed us as her family, the emergency services or the police of the true events that actually occurred that night.

"This ultimately delayed any important and immediate medical attention which should have been provided to our daughter.

"The actions and lies of those involved are unforgivable and no family should ever have to go through this.

"The laws concerning our daughter's death are outdated and need modernising for today's society as soon as possible to stop anymore untimely young deaths.

"Such a loving and vibrant life was taken from us far too soon. We love you Ellie and you are truly missed. God bless."

Sergeant Alan Wood from the Serious Collision Investigation Unit said: "This is a tragic case where a young woman has sadly lost her life following a night out celebrating.

“Following a highly dangerous act resulting in appalling consequences, these three decided against telling the truth, choosing instead to cover up what actually happened with utterly disgraceful lies in an attempt cover up what was a serious crime.

“Our thoughts remain with Ellie’s family who have had to suffer the consequences both of the actions of Hickman and the callous lies told afterwards. Although no sentence will bring Ellie back, I hope it offers some comfort to them and can help them rebuild their lives.”



By [Marion Brennan](#)

[@Marion_EStar](#)

News and features reporter, specialising in human interest and local history stories.

- 9 Comments



[Ian109](#) • 4 years ago

What a vile bunch of people how could anyone do that to anyone. & a friend is unthinkable the girls look evil & should of been given longer sentences I hope they suffer everyday of there lives for what they did to that poor girl selfish evil individuals who killed her & tried to hide it just shows how sly they are



[Crescendo](#) • 4 years ago

Yes, I agree with "Thehoffsleftsock" comment below. An explanation on why comments on some items are not allowed please.



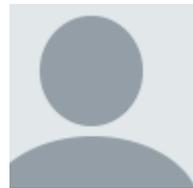
[outofdarkness](#) • 4 years ago

scum



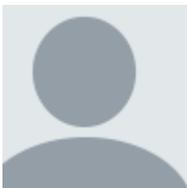
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[Retired Bobby](#) [Thehoffsleftsock](#) • 4 years ago

Because the E and S like a lot of people are scared of the dark, and don't actually like the public having an opinion.

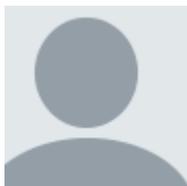


[Ye Olde South Bank Forever](#) • 4 years ago • edited

What? The deceased was apparently a "friend" to Hickman and his pals? God help us all if the rest of us treated our "friends" in such a disgraceful manner. These inhuman, disgusting, vile jobs showed scant regard for the victim's serious injuries, preferring instead to focus on saving their own, pathetic skins.

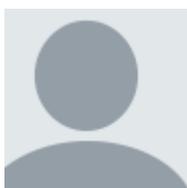
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Sincere condolences to Ellie's nearest and dearest.



[Ian109](#) • [Ye Olde South Bank Forever](#) • 4 years ago

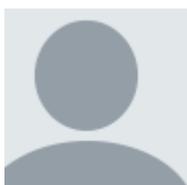
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The one piece of excrement has merely received an 18 month 'community order' These people should each receive 30 years apiece of hard, unrelenting, misery filled labour.



[WolvesGuru](#) • 4 years ago • edited

What a complete bunch of knobs and cowards.

Your friend was hurt take her to a Doctor or Hospital as most sane people would, rather than thinking of saving your own skins first.

Driving a car with the victim on the bonnet, beggars belief and words really, utter stupidity and smacks of having a laugh, or impressing your mates, bigging yourself up...typically whats wrong with some teenagers and gangs these days. Deserve everything you get.



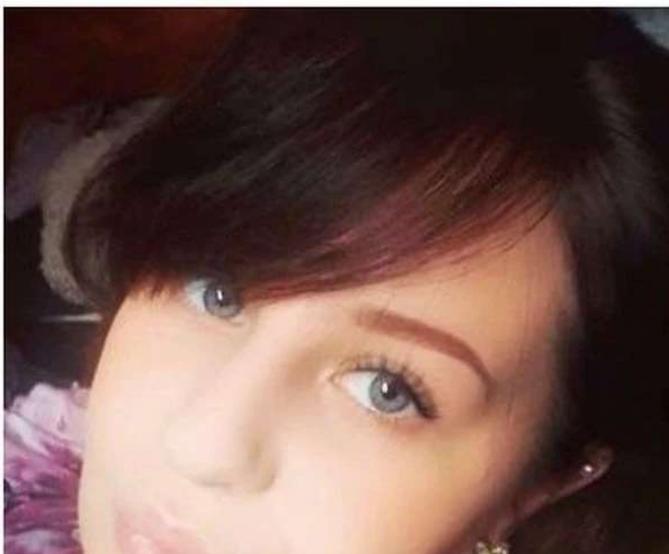
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By [Marion Brennan](#) | [Dudley](#) | [Crime](#) | Published: Aug 15, 2018 | Last Updated: Aug 15, 2018 | 9 Comments

Ellie Underhill died days after falling from the bonnet of a car driven outside Tesco Extra in Dudley on Boxing Day 2016

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Ellie Underhill, and right, Luke Hickman

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Left to right: Ross Bingham, Elly Phillips and Hana Edwards

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The friends even accompanied Ellie's brother to show him where Ellie had allegedly fallen.

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The family appealed for information on social media and on January 5 Phillips and Bingham were arrested.

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News and features reporter, specialising in human interest and local history stories.

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i) Statement of: Pardip Nagra
ii) Statement No: 1
iii) For: Claimants
iv) Dated: 19 July 2022
v) Exhibits: PN1-PN19

**IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION**

CLAIM NO:

B E T W E E N:

**(1) WOLVERHAMPTON CITY COUNCIL
(2) DUDLEY METROPOLITAN BOROUGH COUNCIL
(3) SANDWELL METROPOLITAN BOROUGH COUNCIL
(4) WALSALL METROPOLITAN BOROUGH COUNCIL**

Claimants

and

PERSONS UNKNOWN

Respondents

EXHIBIT PN18

This is the document referred to as "Exhibit PN18" in the witness statement of Pardip Nagra dated 19 July 2022.

<https://www.essexlive.news/news/essex-news/illegal-thurrock-car-meet-5264050>

Police called to illegal Thurrock car meet that attracted around 450 cars in 'blatant breach' of Covid-19 regulations

Officers warned the car cruisers to go home or face having their vehicles seized.

NEWS

BY

Mel King Content Editor

- 07:49, 5 APR 2021



The Manorway in Thurrock was one of the places the car cruisers went to (Image: Google Maps)



Hundreds of cars attended an illegal car meet in Essex over the Easter Bank Holiday weekend.

Yesterday evening (Sunday, April 4), a large group of coronavirus rulebreakers met up in the car park of Sainsbury's in **Chelmsford**, then proceeded to move onto The Manorway in **Thurrock**.

Essex police officers were made aware of the large car meet and quickly attended the scene to disperse the drivers. The officers warned the car cruisers to go home or face having their vehicles seized.

When officers arrived, they found up to 450 cars illegally attending the car meet, which is against current government's coronavirus regulations.

Last night, Chief Inspector Richard Melton, District Commander for **Thurrock** said: "If you come to Thurrock this evening and take part in a car cruising event you could have your car seized.

"Our partners at Thurrock Council have put additional measures in place, such as a public space protection order (PSPO) which give us increased powers to deal and disperse these events.

"And we have additional resources available to us this weekend meaning if you come here, we have the manpower to deal with you.

"If you go somewhere else in the county, we'll be there too."

"This meet would be a clear and blatant breach of the Government's Covid-19 regulations"

Chief Insp Melton added these events can pose a risk to those attending and to the public: "We know that when these events take place, there are some of those involved who will drive anti-socially and sometimes drive dangerously.

"This puts them at risk as well as members of the public.

"Additionally, this meet would be a clear and blatant breach of the Government's Covid-19 regulations so if you attend, you can face a fine.

"Our message is clear: If you're planning to meet, don't. Go home. You could have your car seized, you could face a fine for breaching Covid-19 regulations, and we have the resources available to deal with you."

We have contacted Essex Police for an update on this incident and will be bringing you the very latest information when we get it.

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Police called to illegal Thurrock car meet that attracted around 450 cars in 'blatant breach' of Covid-19 regulations

Officers warned the car cruisers to go home or face having their vehicles seized.

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The Manorway in Thurrock was one of the places the car cruisers went to (Image: Google Maps)

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"Our partners at Thurrock Council have put additional measures in place, such as a public space protection order (PSPO) which give us increased powers to deal and disperse these events.

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"This meet would be a clear and blatant breach of the Government's Covid-19 regulations"

Chief Insp Melton added these events can pose a risk to those attending and to the public: "We know that when these events take place there are some of those involved who will drive anti-socially and sometimes drive dangerously."

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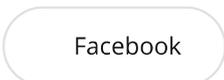
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“Our message is clear: If you’re planning to meet, don’t. Go home. You could have your car seized, you could face a fine for breaching Covid-19 regulations, and we have the resources available to deal with you.”

We have contacted Essex Police for an update on this incident and will be bringing you the very latest information when we get it.

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i) Statement of: Pardip Nagra
ii) Statement No: 1
iii) For: Claimants
iv) Dated: 19 July 2022
v) Exhibits: PN1-PN19

**IN THE HIGH COURT OF JUSTICE
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B E T W E E N:

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(2) DUDLEY METROPOLITAN BOROUGH COUNCIL
(3) SANDWELL METROPOLITAN BOROUGH COUNCIL
(4) WALSALL METROPOLITAN BOROUGH COUNCIL**

Claimants

and

PERSONS UNKNOWN

Respondents

EXHIBIT PN19

This is the document referred to as "Exhibit PN19" in the witness statement of Pardip Nagra dated 19 July 2022.

Councils and police seek new ban on street racing in region

Released: Monday 4 July, 2022

Wolverhampton, Dudley, Sandwell and Walsall councils have announced they will be applying for a new High Court injunction to ban "street racing" in the Black Country.

Working in partnership with West Midlands Police, they will return to the High Court later this year to seek a ban on street racing, also known as car cruising, across the four boroughs.

If granted, the injunction would forbid people from participating in, attending, promoting, organising or publicising a street racing event. Anyone ignoring the injunction could be arrested, face penalties such as up to two years' imprisonment or an unlimited fine, or have their assets seized.

The councils are expected to issue proceedings in a few weeks' time, with a court date likely to be later this summer or early autumn.

For the purposes of the application, street racing is defined as the act of drivers of cars, motorbikes or quadbikes meeting to race or show off in their vehicles.

A similar injunction had previously been in force in the Black Country for a period of six years, and had helped dramatically reduce instances of street racing across the region in that time.

The new application is once again being led by the City of Wolverhampton Council on behalf of the four Black Country local authorities and West Midlands Police.

Councillor Jasbir Jaspal, the City of Wolverhampton Council's Cabinet Member for Public Health and Wellbeing, said: "Street racing is noisy, dangerous and illegal and some events have resulted in serious injuries and even death.

"Over the last few years, we and the police have received hundreds of complaints about dangerous driving, excessive noise, littering and people and vehicles obstructing highways and residential or business properties.

"Law abiding drivers can also feel intimidated when, through no fault of their own, they inadvertently find themselves in the middle of a street race.

"The previous Black Country-wide injunction proved incredibly effective in reducing instances of street racing across the region. However, the problem still persists in some areas, and has started to grow again since the original injunction expired.

"It is important that the authorities have the powers they need to crack down on street racing as and when it occurs and so we are pleased to be in a position where we will shortly launch new proceedings and are hopeful that we can secure an injunction as soon as possible."

People are invited to submit comments and observations regarding street racing and the application for a new injunction by emailing litigation@wolverhampton.gov.uk. Comments received may be presented as evidence to the High Court.

Incidents of street racing should be reported via asbu@wolverhamptonhomes.org.uk or to West Midlands Police on 101. In an emergency, always dial 999.

ENDS

Notes to editors:

1/ For more information or to arrange an interview, please contact Paul Brown, Communications Manager, on 01902 555497 or email paul.brown@wolverhampton.gov.uk.

- **Issued by the City of Wolverhampton Council's Corporate Communications Team.**
- **For more information, please call 01902 555439.**
- **More news from the City of Wolverhampton Council is available at:**
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 - www.twitter.com/wolvescouncil
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i) Statement of: Ch. Supt. Ian
Green
ii) Statement No: 1
iii) For: Claimants
iv) Dated: July 2022
v) Exhibits: -

**IN THE HIGH COURT OF JUSTICE
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(3) SANDWELL METROPOLITAN BOROUGH COUNCIL
(4) WALSALL METROPOLITAN BOROUGH COUNCIL**

Claimants

and

**PERSONS UNKNOWN ENGAGING IN DANGEROUS DRIVING AND
ASSOCIATED ACTIVITIES**

Defendants

WITNESS STATEMENT OF IAN GREEN

I, IAN GREEN, Chief Superintendent of West Midlands Police currently stationed at West Bromwich Police Station, WILL SAY AS FOLLOWS:

1. I am the Force Lead for Operation Hercules which is the West Midlands Police (WMP) response to illegal street racing and road safety. I have been the lead since 2018 having set up the Operation in Birmingham. WMP are absolutely committed to preventing fatalities and accidents on our roads and to reduce and target those who drive recklessly and endanger lives and commit Anti-Social Behaviour and Operation Hercules is our strategic and tactical response to tackle these issues.
2. Nationally the issues are addressed by each force in different ways with many utilising Road Traffic Legislation or civil enforcement powers through PSPOs or injunctions. WMP and local authority partners, have previously utilised injunctions due to the geographic areas that are targeted by the racers and organisers. This has been through injunctions across the Black Country, Solihull and Birmingham.

3. WMP have approached this in a number of ways:
 - a. We have utilised the injunction to enforce against the groups in the past with some success, but this has required large scale operations being implemented and run on peak offending days and times to try to disrupt the illegal activity. These resources are often drawn away from core business to tackle this issue.
 - b. We have increased patrol activity in main affected roads to try to gather information and intelligence of activity and those involved.
 - c. WMP have sent out joint communications across media and social media around the dangers of illegal street races and the potential punishments and enforcement.
 - d. Most recently we have adopted a systematic approach to those who are involved. Evidence will be gathered through various techniques and on the 3rd occasion an individual is sent a warning letter (detailing all the legislation and possible sanctions against them) asking them to stop joining in with suspected illegal activity. If the behaviour continues they are then sent a further letter informing them that both their housing / tenancy will be reviewed due to the ASB and that their insurance company is being notified as to their street racing activity. After a 3rd occasion they are either then issued with a Community Protection Notice which directs them to stop the activity or sends them on a new diversionary course led by West Midlands Fire Service. If this is then breached then a Community Protection Order is served with the potential of arrest and a criminal charge being laid against them.
4. Each measure alone has an effect to reduce the activity but individuals will quickly learn or adapt to the policing but with all the elements in place it allows a proportionate policing response to the threats and risk posed dependent on the activity. The previous period with the injunction allowed police to enforce robustly when extreme and dangerous activity was taking place. At times there has been hundreds of individuals lining roads whilst drivers carry out burn outs and drag races past them without regard for the safety of the public or those spectating or in the vehicles.

5. Activity has continued to take place even during the pandemic period and was in fact encouraged on social media during the lock down as they knew there would be less people on the roads. This issue affects every community across the WMP area and there are several Members of Parliament who work alongside WMP to ensure a robust response due to the impact on their communities.
6. Without the injunctions we risk those, who are intent on committing danger on our roads, to continue to carry out their activity with a limited ability to enforce against them. We have previously attempted to design out the issues with road safety furniture being installed only to see the organisers and attendees simply move to another stretch of road meaning the cost of work is disproportionate and merely moves the issue.
7. This is a key priority for WMP as we are trying to prevent the sort of incidents we have seen in Stevenage and Birmingham, where lives are lost for such an irresponsible activity. The residents affected by these gatherings are suffering significant mental health issues due to engines revving and cars racing up and down and feel scared to go outside. We have also seen and interacted with people as young as 13yrs or 14yrs at these races and we have intelligence around drugs being openly sold and consumed during race meetings.

Statement of Truth

I believe that the facts stated in this witness statement are true. I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

Signed



Date

19/07/2022

Print name in full Chief Superintendent Ian Green (1218)

i) Statement of: PC MARK
CAMPBELL
ii) Statement No: 1
iii) For: Claimants
iv) Dated: July 2022
v) Exhibits: Exhibit MRC1 –
MRC3

**IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION**

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Claimants

and

**PERSONS UNKNOWN ENGAGING IN DANGEROUS DRIVING AND
ASSOCIATED ACTIVITIES**

Defendants

WITNESS STATEMENT OF MARK CAMPBELL

I, MARK CAMPBELL, Police Constable 6018 of West Midlands Police currently stationed at Chelmsley Wood Police station, will say as follows:

1. I am PC 6018 Campbell and I am making this statement on behalf of the West Midlands Police in support of the claimant's application for an Injunction in relation to Street cruising within the Black Country local authority area. I have been a Police officer for 25 years and have worked on a number of specialist teams.
2. I am now the subject lead for Operation Hercules which is the West Midlands Police tactical approach to street cruising, which over the last couple of years has become a growing issue. I have been the

West Midlands lead on this subject for approximately 3 years, and in that time, I have witnessed the organised approach that organisers take in facilitating such events. I have had a leading role in a number of different approaches to tackle the issues that street cruising causes. This application however is made knowing the positive impact which a further injunction would have in supporting the Police to tackle the unlawful behaviour of the individuals who put the public at risk on an increasingly frequent basis.

3. Operation Hercules has been set up by the West Midlands Police as a strategic response to organised street cruising that takes place across the region. During the events numbers of vehicles, including Cars, motorcycles and Quad bikes, congregate together often in car parks or other open spaces to race or show off their vehicles. They then travel as a group to a section of road where some of these drivers, watched by spectators, race at high speed, behave in an anti-social manner, and perform dangerous stunts this includes drifting.

4. Drifting means, when a vehicle is driven around a roundabout or a bend in a road at such a high speed that that traction is lost between either the rear tyres or the front tyres and the road surface, therefore forcing the vehicle into a skid which is controlled by some acceleration together with steering action into the direction of the skid. These opposite forces cause the vehicle to drift around the bend or roundabout on the absolute edge of the vehicle's handling capabilities. Should the driver lose control of the vehicle at this point, due to a blown tyre or loss of grip from the tyres, a collision would be highly likely.

5. Given the fact that street-cruising involves a large number of vehicles and spectators it poses a very serious risk to public's safety not only to the individual who are often standing both on and off the carriageway watching in very close proximity and encouraging these activities, but also to other road users going about their business.
6. In my experience there is never any kind of stewarding or marshalling of the spectators and again this significantly raises the threat, harm and risk factors relevant to those individuals. It is only a matter of time before the high-speed driving involved in the organised races leads to a multiple fatality incident. This may be the driver of the vehicle, an innocent member of the public driving along this stretch of road or any number of spectators actively taking part on the street cruising meet.
7. Organised meets are now taking place throughout the week and on weekends. It is likely that not before too long these meets will become a daily occurrence in the Black Country and surrounding areas. The race meetings are becoming increasingly well organised with only a few key individuals at the heart of organising them. I will deal with this issue in more detail below.
8. In April 2021 officers from the Operation Hercules team identified 4 main car cruising organisers, who were organising and attending illegal car cruising meets. Members of the Operation Hercules obtained and executed 9 search warrants on these suspected organisers home addresses and their vehicles. The warrants were obtained under Conspiracy to Cause a public nuisance legislation

as it was believed that the following individuals were directing hundreds if not thousands of followers to attend various locations throughout the Black Country causing a public nuisance.

9. The Magistrates were supportive of the warrants, and it is expected that more warrants will be executed going forwards. The volume of evidence against the individuals obtained from officers and via intelligence was substantial, and during the searches a large amount of electrical recording devices were seized and downloaded. It was clear from the start that the organisation of the car cruising meets was via social media, hence the phones, laptops and other recording devices were seized.
10. Between the 4 organisers they have over 40000 followers. Seeking to deal with street cruisers in this manner places a significant demand on Policing teams and where the number of attendees is high, it can result in a high risk to all involved.
11. On numerous occasions I have policed the street cruises throughout the Black Country, Birmingham and the greater West Midlands area, during these meets I have witnessed 400 plus vehicles parked either in a car park or more worryingly on a stretch of dual carriageway such as Black Country Route or Manor Way. The potential for a very serious collision is massive, just because of the speed some of the vehicles will race at. However, when Police are called to attend these meets the street cruisers will drive off in a chaotic manner, over central reservations, along footpaths sometimes travelling the wrong way down a dual carriageway into

oncoming vehicles. It is only a matter of time before this will result in a fatal collision.

12. These meets have a knock-on effect in that high numbers of officers are required to Police the street cruisers' meet, the teams are not therefore providing Policing to other parts of the community. In addition, other teams across the Policing structure such as Force Traffic, Operations Dog units, Operational support units, Force support, drone Teams and National Air service (Helicopter), to name a few are often required to intervene and add support. Not only is the cost of policing these events huge, but the price paid by communities including residents and businesses are incalculable. They are exposed to a high level of harm, noise, intimidation, disruption and frankly torment, threats made to innocent members of the public is taking place all too often.
13. I have personally spoken to members of the public who are at their wits end wanting to move from the area, one even had suicidal thoughts of the constant noise and intimidation, one individual was assaulted and robbed of their mobile phone after approaching a group of street cruisers performing stunts.
14. It is abundantly clear that the risk posed to the public in terms of their safety and also their mental health is very high. This applies to those participating, watching and organising events, but also to those taking part, simply living or working nearby or even just driving past at the wrong time. There is little doubt that without intervention this is a disaster waiting to happen, there will be a

serious collision in which people are very likely to be seriously injured or killed.

15. This has been demonstrated recently in Stevenage, Hertfordshire. On the 18 July 2019 a collision occurred at a street cruising event which sadly resulted in one person suffering life changing injuries and 16 others being injured. The fact that no one was killed was purely down to luck. The two drivers involved in that collision were charged with dangerous driving, together with other offences, one received a 5-year sentence and a large disqualification, and the other driver received a 4-year sentence together with a large disqualification.

16. I have produced a DVD, which I can produce as "**EXHIBIT MRC1**". This has been downloaded from the court footage from the street cruising meet in Stevenage, in which two street racers collide on a stretch of road and then both vehicles collide with 17 spectators. This is a very descriptive example of how these street cruising meets can go dramatically wrong and is the exact reason for the obtaining of a new injunction. The footage is quite shocking in its content, but this is the real nature of what takes place and shows the dangers not only to the drivers, but the spectators.

17. These collisions again only highlight the burden placed on the Criminal justice system, Courts and Her Majesty's Prison service. More to the point, bringing criminal proceedings requires an incident to have occurred. The aim of all of those involved with the making of this application is to prevent such incidents occurring in the first place.

18. Unfortunately for the West Midlands Police, Local authorities and the general public, the Black Country has become one of the street-racing hot spots of the Country. And it is therefore vital that action is taken to replace injunctions that have previously been granted before an inevitable serious incident takes place, such as described above.
19. An injunction will without doubt aid in the policing and prevention of street cruising. It is a highly valuable and a tried and tested means of prevention and resolution. There is not a "One size fits all" approach to this issue, but an injunction with a power of arrest is an essential part of the collaborative approach needed to reduce the numbers involved and help deter those on the periphery along with giving the Police and the local authority the powers to deal with offenders determined to engage in unlawful behaviour. In my experience, there is no other remedy available to the authorities, which has the effect of preventing street cruising from taking place, as the injunctions obtained by various local authorities in the West Midlands over the past 11 years have been proven to do.
20. I have produced a compilation DVD featuring footage from Police sources, highlighting the dangers caused by the Street cruisers and the ability of Police to try to Police these meets. I can produce this compilation DVD as marked as "**Exhibit MRC2**". It comprises the following clips of footage.

Clip 1 contains footage of a Police pursuit of a Vauxhall Corsa along the Black Country Route, highlights the danger of the

speeding vehicle to the spectators and parked vehicles lining the roundabouts to view the street racing.

Clip 2 contains footage from an unmarked Traffic vehicle of a White BMW drifting around the Waterfront Car park, Merry Hill, Dudley. The footage shows the volume of spectators attending to watch the vehicles performing stunts.

Clip 3 contains footage of a street racer, driving along Kenrick Way, West Bromwich, where a traffic vehicle records its speed at approximately 100mph in a 40mph restricted road.

Clip 4 contains footage from Operation Hercules team of a Audi failing to stop for officers having been seen street racing along the Black County Route. The occupant of the vehicle is seen to throw a glass bottle at the pursuing traffic vehicle.

Clip 5 contains footage from Sandwell LA CCTV cameras located on Kenrick Way, West Bromwich, it captures spectators lining the street recording the racing on their mobile phones.

Clip 6 contains footage from social media of a collision involving street racers, where the car can be seen leaving a roundabout and nearly hitting a number of spectators. Only minor injuries were caused in this collision.

Clip 7 Contains footage from the A47 in Birmingham. This footage was recorded from a marked traffic vehicle and is included as it highlights the transient nature of the street racers. The racers who

attend the Black Country are also the same racers that attend Birmingham and Solihull. It details the sheer volumes of spectators and the disruption these individuals cause.

THE ORGANISATION OF STREET CRUISES

21. The way in which events often unfold is that a group will advertise a post code and a time on one of the various social-media platforms for all those interested to attend, from there different postcode will be further posted throughout the evening. Vehicles participating in these street cruises will then see these postcodes to race and then in turn cause mass anti-social behaviour. This is very much organised crime and many amongst these groups are aware that the injunctions are no longer in place and are more willing to attend and take the chance of not being caught due to the cruising vehicles massively outnumbering the Police.

PARTICIPANTS

22. It is impossible to say how many people are actually involved in/or participate at these street cruising events as numbers tend to fluctuate rapidly. However, the average street cruising meeting can attract up to 150 to 200 vehicles per night. Bank holidays and warm weather does impact on these numbers greatly. These can swell the numbers upwards of 500 vehicles.

23. I have witnessed at Black Country Route, Kenrick Way, West Bromwich and Manor Way, Halesowen over 200 spectators standing around the various roundabouts and lining the road, encouraging the racers to go faster and perform more dangerous drifting.
24. Spectators will record the racing on their mobile phones, which is then posted onto the various social-media sites. The sheer numbers of spectators places unrealistic demands on the Police and make it a large scale public order event rather than a local policing issue. I have again on more than one occasion witnessed the large crowds of spectators turn on the Police, throwing missiles at Police cars and officers, causing damage and injury.
25. We have on average 100 to 150 spectators line the street and roundabouts, actively taking part in the racing by encouraging the behaviour. I will often see spectators standing in the road or in the middle of the roundabout to get the best filming location. My greatest fear is that during one of these street cruising meets a car will lose control, leave the carriageway and collide with the spectators, again this collision is inevitable and will only result in an extremely serious collision.
26. As I have described the spectators have very much become a part of the issue, to the point I describe the street cruising as a spectator sport. At present the powers which the police have to their disposal are limited, i.e. dispersal powers under Section 35 of the Anti-Social Behaviour, Crime and Policing Act Act 2014, obtained from an Inspector. However, the direction to exclude someone from

an area can only last a maximum of 48 hours, meaning that participating individuals can simply return again for the next street cruising event.

27. The street cruising events are becoming increasingly well organised and professional, with only a few key social media sites being used to organise the meets. The organisers will hide behind the anonymity of these social media sites, so their names do not appear and incriminate themselves.
28. However, it has become clear that the minute warrants are executed on a specific individual or social media account holder, another organiser will appear and take over where the previous organiser left. I have even heard that certain Instagram accounts are sold on to other street cruisers after their identity is discovered by Police. This tactic makes it extremely hard for the Police to keep a track on who is running the accounts.
29. The main street cruising accounts appear on Instagram, however since the arrest and series of warrants that was executed on the previously known street cruising organisers, a number of new accounts have changed tactics to evade Police and are now using closed WhatsApp and Snap chat to organise the meeting points.
30. I am aware of a number of the new accounts that have come to the forefront of organising/advertising the meets. They are as follows:

- @Forza_Birmingham, is an Instagram account and has over 24000 followers.
- @WV_racetracks, another Instagram account and has nearly 700 followers.
- @Modified_midlands, this Instagram account has nearly 9000 followers.
- @Birmz_gapperz, this Instagram account has 2500 followers.
- @section.fifty9, this Instagram account has nearly 1500 followers.
- @Tracks_birmingham, which has now become @tarcks_uk, and has over 10,000 followers. This group, however, has recently become somewhat of a pariah within the West Midlands Street cruising scene; this Instagram account was very active in organising street cruising in Black Country, but recently other @tracks_ Groups have appeared from other surrounding regions i.e. @tracks_leicester, @tracks_Nottingham, @tracks_MK (Milton Keynes) @tracks_derby.

31. When all of these groups gather it creates in some cases gatherings of over 400 vehicles. At present due to certain groups

not being liked within the West Midlands groups those groups tend to go to the other mentioned regions to race.

32. At present these groups organise racers to gather at various known locations on a weekly basis, these many groups will advertise together to attract more attendees and therefore create a much larger issue for the Police and local authority to deal with. Between just the above-mentioned organisers they have somewhere in the region of 40000 followers, this means that if even a small proportion of those were to attend a street cruise, there could easily be in the region of 500 vehicles or more present.
33. However, as I have previously mentioned, new intelligence provided by West Midlands Police does suggest that there is a movement away from the Instagram accounts towards Snapchat and WhatsApp following a policing success on a number of the organisers of street cruising events, depriving the Police their ability to disrupt these events.
34. Throughout the last 3 years where I have been the Force's lead officer in dealing with the street cruisers, I have noticed the age range of individuals dealt with for traffic offences/ section 59 warning notices varies widely, anywhere from 17-year-olds who have just passed their test all the way up to over 50 years old. The attendees are from various ethnic backgrounds, including White, Black and Asian, and there are just as many females as male attendees. This information also refers to the drivers, passengers and spectators. On-going work is still be conducted to establish and

analyse who all of the exact organisers are of these meets are in order to prosecute them.

35. Vehicles that attend can vary from the standard unmodified vehicles to heavily modified vehicles, many of the modifications are made to the vehicle to improve the basic performance of the vehicles, and these include adding hybrid turbos, air intake valves or even replacing engines. One of the main causes on the anti-social behaviour is the noise coming from the cars, many have the catalytic converters removed (de catted), have a straight exhaust pipe from the engine so the volume of noise exceeds the allowed decibel levels, or a larger bore exhaust system is added, this again creates a large volume of noise. The biggest issue is the extremely loud bangs that come from the cars, often the Police will get reports of a gun being shot, but in fact it is purely a modified car's exhaust system burning off the excess fuel.

LOCATIONS

36. This is a regional issue. There are areas across the region from Coventry to Wolverhampton and far beyond into our neighbouring Forces and local authority areas.
37. I have produced a booklet containing 7 maps of the main locations where the street racing takes place across the Black Country local authority. The main areas of concern are as follows:-
- Manor Way, Halesowen
 - Duncan Edwards Way, Dudley

- Waterfront Way, Dudley
- Tesco car park, Birmingham Road
- Kenrick Way, West Bromwich
- Tesco Car park, Willenhall
- Black Country Route

38. This is not a definitive map as the race organisers evolve on the Police attendance, they will change locations to find a new unused area. I can exhibit this booklet as "**Exhibit MRC3**".

39. The above-mentioned locations are well known throughout the street cruisers, Police attend these events after calls from a member of the Public, the attendees will simply run to their vehicles and drive away from the area, the vehicles possibly racing will immediately drop their speed to prevent any prosecutions for various traffic offences.

40. More often than not the meets will have a number of spotters, who park a small distance away from the meeting location and will inform the organisers on the approaching Police. On hearing this, the various organisers will contact the attendees on social media groups stating "Scatter", the cruisers will then drive off awaiting a further postcode of the next location to be sent through.

41. This tactic is very hard for the Police to combat, but with the use of plain traffic vehicles the Police are able to attend the meets without being seen. Unfortunately, the use of a plain traffic vehicle cannot always be guaranteed.

OTHER REMEDIES

42. There is a wealth of Road Traffic legislation available to Officers along with powers under the Police Reform act and Anti-Social Crime and Policing act, but these rely quite heavily on the Criminal Justice System to a large extent. This means that some criminal behaviour must have taken place, and police must have caught the accused.
43. The criminal justice system does not have any protective or preventative effect in stopping the street-cruises from taking place and, for the reasons I have already explained, policing large events is so resource intensive that West Midlands Police cannot realistically attend every event in the numbers necessary to apprehend significant numbers of participants.
44. It follows from this that conventional policing and prosecution has very little if any deterrent effect. On many levels prosecuting individual drivers via the criminal justice system comes with its own problems, since the Black Country Council's Street cruising injunction has not been renewed, the only way to prosecute the cruisers/drivers is to see a moving traffic offence and prosecute for that offence, such as careless driving, speeding or simply a construction and use offence.
45. At the time of the offence the driver is spoken to, but basically is allowed to go about their business, possibly re-joining the street cruisers at the next location. Once the driver is issued with a ticket for the offence it can take anywhere upwards of six months for their

case to be heard, recently I have been in court with a careless driver that took nine months to get into Court. This is simply not providing the correct deterrent to change the mind-set of the cruiser to prevent them re-attending.

46. There needs to be an alternative method of resolution. Injunctive relief operates to prevent the conduct described above from taking place, with the effect that residents, businesses and other road users are not affected and do not have to wait for a further disruptive event before action can be taken.

47. We have also found that an injunction serves not only as a clear and immediate deterrent, but also as a means of immediate removal of the issue before an event can even begin. Enforcement of the injunction is very quickly spread through social media posts throughout the street cruising community and demonstrates a determination on the part of the Police that robust action is being taken. This not only deals with the individual at the time but sends a very important wider message.

Statements

48. **Councillor Linda Leach**, who represents the Bilston area has provided a statement in which she details the roads which are mainly effected in her constituency. She is also states that whilst the previous street cruising injunction was in place the noise anti-social behaviour dropped dramatically, but since the loss of the injunction in 2021 the complaints and concerns have risen.

49. Councillor Leach fully supports the Street cruising injunction application by the Black Country local authorities.

Julia Westwood

50. Has provided a statement in full support of the Black Country local authorities' application to obtain a new Street cruising injunction. J. Westwood has lived near to the Black Country route near Darlaston for 17 years, and has over the last few years had to put up with the issues of the car cruising scene. She states that in the summer months she can't have her windows open due to the sound of high-powered cars using the Black Country route as a race track into the early hours of the morning.

Lee Roden

51. Will state in his statement that he lives approximately 1.5 miles away from the A463 Black Country route, Darlaston in the borough of Walsall, where he has lived all of his life. Over the last two years he states he has put up with street cruisers using this section of road as a race track, which really impacts on his life due to lack of sleep and general noise pollution. He strongly supports the application to obtain a new street cruising injunction.

Mr Simon Pearson

52. Has a provided a statement in full support of the local authorities application to obtain a new street cruising injunction for the Black County area. Mr Pearson states that he worked in the Birdcall's area of Walsall, where the local road was blighted by the regular racing of high-powered vehicles performing stunts such as doughnuts. He also states that he had on numerous occasions called the Police regarding the street racing taking place.

Mrs Kelly Matthews

53. Will state that she has lost count of the amount of times she has reported the on-going issues with the racing taking place along Green Lane, Walsall. Mrs Matthews suffers from anxiety, depression and panic attacks and is struggling to deal with the noise pollution which only makes her issues worse. She wishes something could be done to stop the racing in her local area.

James MORRIS MP

54. Mr Morris MP represents Halesowen and Rowley Regis. Mr Morris has provided a detailed statement of the issues of the anti-social nature of the street racing mainly along Manor Way, Halesowen, whereby he will state that between 2015 and December 2020 he only received 5 complaints from his constituents in relation to vehicles travelling at high speed, but since December 2020 he has been contacted by 33 residents concerned about car cruising on the A456 Manor Way.

55. He has written to 1055 households on 27 different roads who are affected by the car cruising issues, urging them to sign a petition. 844 residents signed this petition, demonstrating the strength of feeling on the issue. He also details the detrimental effect the racing has on their lives.

Nicola Richards MP (for West Bromwich East).

56. Nicola Richards will state that she is in full support of the application to obtain a new street cruising injunction and writes this statement on behalf of her West Bromwich East constituents, who regularly contact her with their worries over street racing in areas such as Kenrick Way, West Bromwich.

57. This particular road suffers noisy cars, large gatherings and dangerous driving on the evening. Her constituents describe these issues as alarming and clearly organised. She also describes that since the expiration of the previous street cruising injunction the issues have worsened and could lead to a serious incident. MP Nicole Richards has received 649 signatures to a petition related to car cruising, again demonstrating the issue blighting this area.

Ronald Hill.

58. Mr Hill is providing a statement in relation to the street racing that takes place in and around the Kenrick Way area of West Bromwich. He will state that that this area has suffered over a number of years from anti-social behaviour caused by racers using this stretch of road as a racetrack, mainly on a weekend. He describes how the street racers will use the road system near to his

home as a racetrack and regularly sees large groups of spectators. He fully supports the new Street cruising application.

59. These summaries of statements are not a complete list obtained from members of the public, but all fully support the application to obtain a new Street cruising injunction.
60. Over the past 3 years of my involvement in Operation Hercules, Police have attempted to change driver behaviour using a number of different methods.
61. One such method was on 29th May 2000, whereby 85 vehicles were stopped on the A38, Sutton By-pass, near to the M6 Toll Road. These vehicles had been cruising around Coleshill, Warwickshire then Solihull before entering Birmingham and travelling along the A47 Fort Parkway and then driving along the A38. All of the drivers and passengers were engaged with and attempts were made to educate the attendees of this particular street cruise about the potential dangers associated with car cruising and actively taking part in street racing. This enforcement took 4 hours to deal with all the parties.
62. Whilst this demonstrated to other road users that action will be taken, this technique, however, has proved unsuccessful and appears to have had no effect on the number of street-cruises taking place or the number of attendees at these events.
63. Indeed, as I have said, street cruising is on the increase regionally and on a national level. The 85 vehicles stopped including their occupants are the same racers who attend Solihull,

Birmingham and then the Black Country. The racers do not see local authority boundaries and will simply move between locations where they feel safe to race.

64. Other options available to the Police to change the driver behaviour is the issuing of fixed penalty notices for offences such as Careless driving, speeding, mobile phone offences or basic construction and use, but as previously mentioned, this can take time to achieve the necessary prosecution either in court or an acceptance of the offence.
65. The combination of points on their licence and a financial penalty can on occasions deal with poor driving standards. However, just the sheer volume of participants means that the vast majority will not be prosecuted and will therefore just carry on attending the street cruising events.
66. On a few occasions Police will see some kind of dangerous driving or will be engaged in a pursuit, where the offending vehicle then fails to stop for Police. This type of offence can lead to a custodial sentence depending on the severity of the offence, but these types of incidents are few and far between, having little impact on the larger group, but potentially can prove dangerous to other innocent drivers caught up in the pursuit.
67. Public Space Protection Orders ("PSPO") under the 2014 Act may also in principle be available. However, and based on the

evidence, I feel that a PSPO would be difficult to implement and would not be likely to be an effective remedy.

68. In my limited knowledge of the PSPO orders, I do feel that the transient nature of the Street cruisers would simply mean that if a small area is covered by one of these orders the street cruisers would simply drive 5 minutes down the road to another location not covered by a PSPO order.

69. Under Section 59 of the Police Reform Act 2002, Officers have the power to stop vehicles from driving or to remove them from the road or from a private place, where they are involved in careless or inconsiderate driving and have caused anti-social behaviour. This is a useful power, but again it requires the driver to have committed the anti-social behaviour and bad driving, which is the purpose of this application to prevent, and ultimately the offending driver will get their vehicle back if seized, possibly the following day and then will be in a position to reoffend at a later date.

Injunctions against named individuals:

70. Where individuals can be identified they should be added as a party. However, the numbers attending these meets are so great that identifying all the potential defendants is simply impractical. If there are individuals who are known organisers/ringleaders it may be appropriate to name and add them as individual parties, but then, of course this will require evidence.

Impact of the Injunction

71. When the Black Country Local Authorities obtained the original Section 222 Street cruising Injunction in 2015, the effect on the street cruisers was almost instantaneous, in that, due to the possibility of arrest, the Street cruiser meets virtually stopped. I did refer to it as like a "silver bullet", and for approximately 18 months the situation did not change, to the point where the Police as a whole regarded the issue to have permanently gone away. A noticeable drop in Police call logs from members of the public drastically dropped to the point where the Police as a whole did not need to target the historical racing locations. It was felt that the introduction of the injunction was extremely successful.

72. The Organisers of street-cruising meetings in the Black Country area are well aware that the injunctions are no longer in place or enforceable, and as a result the impact has been profound. Over the last 16 months since the current Section 222 Street Cruising Injunction was not renewed, I have spoken to hundreds of drivers and passengers, who were involved in the street cruising scene.

73. The one comment I hear on a regular basis is "There's no injunction now, so there is nothing the Police can do." There is a firm belief that without the injunctions power the Police cannot stop the large scale meets. A number of the street cruisers describe what they do as being like a religion and nothing the Police will do will stop them attending apart from sending them to prison. One individual street cruiser even stated to me "The only way you will

stop me is to cut my legs off". He genuinely believed this; he has subsequently been sent to prison for disqualified driving.

74. Officers are currently heavily reliant on traffic law, but this fails to impact on those who attend to spectate, as I have said, and for the reasons I have given, it is not effective against such a large, transient and continually returning group of people. I believe that nothing short of an injunction will be effective in stopping these individuals, as it was before the cruisers came to understand that it was no longer enforceable.

75. I do believe that with the supporting injunction in place and with Operation Hercules team providing knowledge and briefings, Officers will be adequately equipped to utilise the current traffic law within a combination of specific multi agency operations to target the street cruisers.

76. West Midlands Police are increasingly working with local authorities, VOSA (vehicle and operator services agency) and specially trained PG 9 trained officers, which enables the Police to deal with a large group of street cruisers either on a car park or with a road, identifying faults or offences and prosecuting the drivers. The PG 9 officers are able to prohibit the vehicles, using these powers in combination with the injunction will have a massive ripple effect throughout the street cruising scene.

77. The injunction needs to be supported by a power of arrest. It has been demonstrated time and again that arresting offenders is a highly effective deterrent in street-cruising cases. I have witnessed first-hand the effect arresting a driver, who has breached the previous injunction, has had on the other street racers is massive. It sends a huge message to all the other drivers and spectators, to the point that on many occasions the night is finished and they go home, not wanting to be the next driver to be arrested.
78. This point is greatly increased when the arrest is advertised with the help of social media. The reverberations throughout the car scene after an arrest is posted on West Midlands Police Twitter or Facebook is incalculable. This only helps promote the Injunction and spreads the word to the public about the actions the Police and local authority are taking to deal with the issue.
79. A power of arrest as part of an injunction is important not only to prevent immediate offending from an individual or group of individuals but also to send a wider message to those persistent offenders that there is an immediate means of addressing their actions which carries robust consequences.
80. I also believe that a civil remedy of this kind has the added benefit of preventing some participants from entering into the criminal justice system with all the negative consequences that that has for their future prospects, and will without doubt also save the lives of others.

PERSONS UNKNOWN

81. Certainly, for the last 18 months or so, there have been very few arrests involving street racers. This is, partially due to a lack of Police numbers and Criminal Evidence Act 1984, in that a driver will only be arrested for the very serious offences such as dangerous driving or failing to stop for Police, where a pursuit has taken place. These offences are rarely seen due to the nature of road layouts and street racing participants seeing the Police early and warning other participants.
82. On any given night Operation Hercules team may only have two officers on duty, it is unfortunately part of Policing that when an offender is arrested that particular Police crew will then be off the streets for at least 4 hours, this fact causes the issue of allowing the street cruisers to carry on potentially driving in a dangerous manner, causing anti-social behaviour.
83. The Police did see a substantial decrease in numbers of calls to the Police during the COVID lockdown, there are many contributing factors to this, but after a couple of months of lockdown the street cruisers did start to meet up within the West Midlands, however the numbers remained low due to COVID fines being handed out, which was many and the formulation of the Operation Hercules team. This team was specifically put together to target the street cruisers.
84. The team became very aware of the locations the gathering were taking place and even though they were not able to stop street racing within the street cruisers, the length of time the cruisers were

at any one location was kept to a minimum, hence why the number of calls to service has remained relatively low.

85. I have produced the below data covering the calls made from members of the public to the Police regarding street racing across the 4 Black Country local authority areas.

Operation Hercules

Street racing calls to service between April 2020 and March 2022.

		DY	SW	WS	WV	Total
2020	Apr	31	52	41	22	146
	May	42	117	40	23	222
	Jun	58	158	35	24	275
	Jul	35	96	37	45	213
	Aug	46	112	29	46	233
	Sep	38	52	30	26	146
	Oct	55	66	25	54	200
	Nov	56	51	11	18	136
	Dec	111	65	34	20	230
	2021	Jan	36	46	26	14
Feb		90	138	13	21	262
Mar		97	97	40	36	270
Apr		67	143	32	41	283
May		35	73	23	26	157
Jun		38	74	25	57	194
Jul		35	57	29	25	146
Aug		37	46	20	12	115
Sep		24	35	15	26	100
Oct		11	47	14	34	106
Nov		19	34	14	33	100
Dec		13	45	18	16	92
2022	Jan	11	62	18	27	118
	Feb	9	53	15	15	92
	Mar	23	50	24	25	122

Key.
 DY= Dudley local authority
 SW= Sandwell local authority
 WS= Walsall local authority
 WV= Wolverhampton local authority

86. From April 2020 to March 2022 there have been 3874 calls to service. A noticeable spike can also be seen in numbers of recorded incidents of street racing after February 2021. February

2021 was the month the Black Country lost its Section 222 Street cruising injunction.

87. The calls jumped from 122 in January to 262 in February then 270 in March and then 270 in March. I was aware of organisers hearing about the loss of the injunction and made the declaration to all of their followers that the Black Country was the area to race in.
88. This number of calls to the Police is averaging just under 170 calls per month, however this does not include the areas of Solihull and Birmingham. The cost to Police to attend these logs and to deal with any of the issues has a massive impact in the ability of the Police to deal with other potentially more serious offences.
89. The Policing from the Operation Hercules team has been very robust and has definitely displaced some of the Street cruisers to other locations such as Birmingham and Solihull and even further afield, such as Milton Keynes, Leicester, Derby and Staffordshire.
90. There is no doubt in my mind that the bad days of previous years will definitely return without this style of Policing being present and can only improve with the reintroduction of a new Injunction and the extra powers it provides.
91. The Operation Hercules team has dealt with a large number of potential street-cruisers by reporting them for various driving offences. On an average month Operation Hercules team consisting of two officers, will report approximately 150 drivers for a variety of offences including careless driving, Excess speed, No

insurance or construction and use offences. This has increased vastly on previous years due to the dedicated team looking at this specific problem.

92. As per my previous comments the time it is taking to get these individuals through the Criminal Court system having an adverse effect and is simply allowing this anti-social behaviour to persist for months awaiting a court date.

93. We have also issued in excess of 500 of drivers with Section. 59, 2002 Act, warnings to drivers for using their vehicles in an anti-social manner, this warning lasts for 12 months, but has not prevented the same vehicles returning to take part in the street cruising. It simply makes the driver more aware of the potential of the Police to seize their vehicle if they commit a careless or inconsiderate offence, coupled with any Anti-social behaviour.

94. The street cruising organisers are well aware of the Section 59 powers and are even advising anyone receiving the warning of their rights and that the Police have to return the said seized vehicle the following day, this has empowered the cruisers to not be as fearful of this power as they will only be deprived of the vehicle for 24 hours. However, due to the large number of participants, the changing nature of the group and the small proportion of arrests made, it is impossible to identify all or most of the persons involved in street-cruising.

95. Even though hundreds of section 59 Warnings have been issued, and numerous individuals have been prosecuted through

Traffic Process, if Officers had the knowledge and support of an Injunction many of the individuals dealt with would have been arrested, the importance of the power of arrest cannot be underestimated, one reason being it immediately removes the danger from the road and means on that occasion the driver cannot commit any further offences or even worse be involved in a serious collision, but the arrest is seen by the larger group of street cruisers and they are left in no uncertain terms that if they continue to drive or behave in this manner they too may have their liberty taken.

96. Due to the overwhelming reliance on Social Media that these groups have, and also the outreach that West Midlands Police Facebook and Twitter has, these high profile arrests would make a real difference in the cruisers willingness to attend such events.

POWER OF ARREST

97. As mentioned earlier and evidenced by the accident in Hertfordshire ("**Exhibit MRC1**"), the unlawful behaviour in which street-cruisers engage puts themselves, spectators, Police and members of the public caught in the middle of such meetings at a significant risk of harm.

98. I have personally witnessed traffic officers being assaulted and having their traffic car damaged, where a missile was thrown through the rear window and the officer had a stone thrown at him, hitting him on the head, this took place in the Birmingham area. This was all due to the Police stopping a street cruiser in an area where over 300 spectators had formed to watch the driving.

KNOWLEDGE OF THE LAST INJUNCTION

99. Signs, detailing the previous Section 222 High Court Street cruising injunction were placed at the below locations, many of which are street-cruising hotspots, however some of the signage was of the foam design and not a permanent fixture.

Dudley signage.

Metal Signage

1. A4123 New Birmingham Road @ Sedgley Rd
2. A451 Birmingham Road @ Castlegate.
3. A461 Dudley Sothern By pass @ Castlegate.
4. A461 Dudley Sothern Bu pass @ Cinder Bank
5. A456 Manor Way on approach to Hayley Green Island.

Foam board signs

1. Flood Street Car park @ Duncan Edwards Way
2. Stafford Street Car park
3. Tesco Car park @ A461 Birmingham Road

Sandwell signage

Wednesbury

1. Retail park, Axletree Way @ Junc 9, M6 (Metal sign)
2. Axletree Way Island. Lamppost 12 (Foam sign)
3. Axletree Way retail park, lamppost 1, (Foam sign)
4. Axletree Way Island, lamppost 34, (Foam sign)
5. Moorcroft Crive @ Hallens Drive. Lamppost 1. (Foam sign)
6. Hallens Drive, Lamppost 18. (Foam sign)
7. Hallens Drive, lamppost 19. (Foam sign)
8. A41 Black Country Route (Metal Sign)

Tipton

1. A461 Island Great Bridge, Lamppost R3/5
2. Brickhouse Lane South, lamppost 7 (foam sign)
3. Entrance to Adsa retail off Great Bridge Street. (foam sign)
4. Dudley port junction@ Sedgley Road East. Lamppost 34. (foam sign)

West Bromwich

1. Green Street@ Kenrick Way, Lamppost 12. (Foam sign)
2. Kenrick Way towards West Bromwich, Lamppost 55 (Foam sign)
3. Kenrick Way, away from West Bromwich. (Foam sign)

4. Blacklake @ New Swan Lane (Foam Sign)

Oldbury

1. Toys R us car park (Foam sign)
2. Toys R us car park (Foam sign)
3. Toys R us car park exit @ Wolverhampton Road. Lamppost 207 (Foam sign)
4. Birchley Island @Junction 2 M5 (Metal sign)

Walsall

1. Black County New Road@ Dangerfield Lane
2. Lichfield Road @Coppice Farm Way
3. Essington Road @ Kewstoke Close.
4. West Bromwich Road @ Greenside Way.
5. Bescot Road @ Fellows Park Gardens
6. Chester Road @ Lichfield Road
7. Chester Road @ Little Aston Road.

Wolverhampton

1. Springvale Way on the following lamppost. 4,22,25,2 and 3.
2. Black Country Route (Small signs) on the following lamppost. 33,28,11,12,3,22,32,41,74.
3. Black Country Route (Large signs) on the following lamppost 16,83,152,174,201,162,138 and 64.

100. Below is an example of one of the signs placed on many of the arterial routes within the 4 local Black Country authorities.



101. Additionally, the injunction was widely publicised across a variety of news channels when it came in force both locally and nationally. It would be virtually impossible for street-cruisers not to be aware of the last injunction. In fact, when stopped, many often commented on such signs, informing the Police that they are aware of the injunctions signs as they say: "You can't miss them", but I personally have been told on more than one occasion that they believed the Section 222 Injunction had stopped.

102. The importance of the signage and a large-scale media report cannot be underestimated. I am aware on more than one occasion that when a street cruiser has been arrested, they will state that "They didn't know about the injunction" even though it had been widely publicised, and they had driven past the signage on more than one occasion that evening.

ENGAGING WITH OTHER LOCAL AUTHORITIES

103. Engagement is at the heart of my work ethos, I try to encourage and expect this from my team and as with many Police initiatives, partnership work is essential. Due to my knowledge within the field of Street cruising and street racing I have work with various Police forces and local authorities throughout the Country. Only recently I am working in partnership with the Metropolitan Police Force and Newham London Borough Council in relation to their ever-increasing issue with illegal street racing and street cruising.

104. I am in the process of advising the local authority as to the advantages of a Street cruising injunction and various other tactical options the Police can invoke. I have also been working along Hertfordshire Police, namely Stevenage Police for the same reason. I have also been working closely with Solihull local authority, in renewing their injunctions and more recently try to obtain a further Injunction for Birmingham.

105. Operation Hercules has been a West Midlands initiative based around the Street Cruising section 222 injunction. In the last 18 months a team of 4 officers has been created to purely provide a tactical response to the ever-increasing issue of illegal street racing and street cruising.

106. The Hercules team has become very proficient at attending and dealing quickly to the street cruisers, so much so that we have pushed large volumes of the cruisers to our neighbouring Police forces. I am therefore working alongside these forces on a regional

basis to advise and provide support to enable them to deal with illegal street racing.

107. The tactical side of Operation Hercules is very much a first of its kind and it is hoped that its success with the support of positive intervention of the courts that a precedent of positive action can be taken.

Statement of Truth

I believe that the facts stated in this witness statement are true. I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

Signed



Date

15.7.2022

Print name in full

MARK CAMPBELL

i) Statement of: PC Mark Campbell
ii) Statement No: 1
iii) For: Claimants
iv) Dated: 13 July 2022
v) Exhibits: MRC1-MRC3

**IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION**

CLAIM NO:

B E T W E E N:

**(1) WOLVERHAMPTON CITY COUNCIL
(2) DUDLEY METROPOLITAN BOROUGH COUNCIL
(3) SANDWELL METROPOLITAN BOROUGH COUNCIL
(4) WALSALL METROPOLITAN BOROUGH COUNCIL**

Claimants

and

PERSONS UNKNOWN

Respondents

EXHIBIT MRC1

This is the document referred to as "Exhibit MRC1" in the witness statement of Mark Campbell dated 13 July 2022.

This is in fact video footage which is available separately.

i) Statement of: PC Mark Campbell
ii) Statement No: 1
iii) For: Claimants
iv) Dated: 13 July 2022
v) Exhibits: MRC1-MRC3

**IN THE HIGH COURT OF JUSTICE
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(4) WALSALL METROPOLITAN BOROUGH COUNCIL**

Claimants

and

PERSONS UNKNOWN

Respondents

EXHIBIT MRC2

This is the document referred to as "Exhibit MRC2" in the witness statement of Mark Campbell dated 13 July 2022.

This is in fact video footage which is available separately.

- i) Statement of: PC Mark Campbell
- ii) Statement No: 1
- iii) For: Claimants
- iv) Dated: 13 July 2022
- v) Exhibits: MRC1-MRC3

**IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION**

CLAIM NO:

B E T W E E N:

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(4) WALSALL METROPOLITAN BOROUGH COUNCIL**

Claimants

and

PERSONS UNKNOWN

Respondents

EXHIBIT MRC3

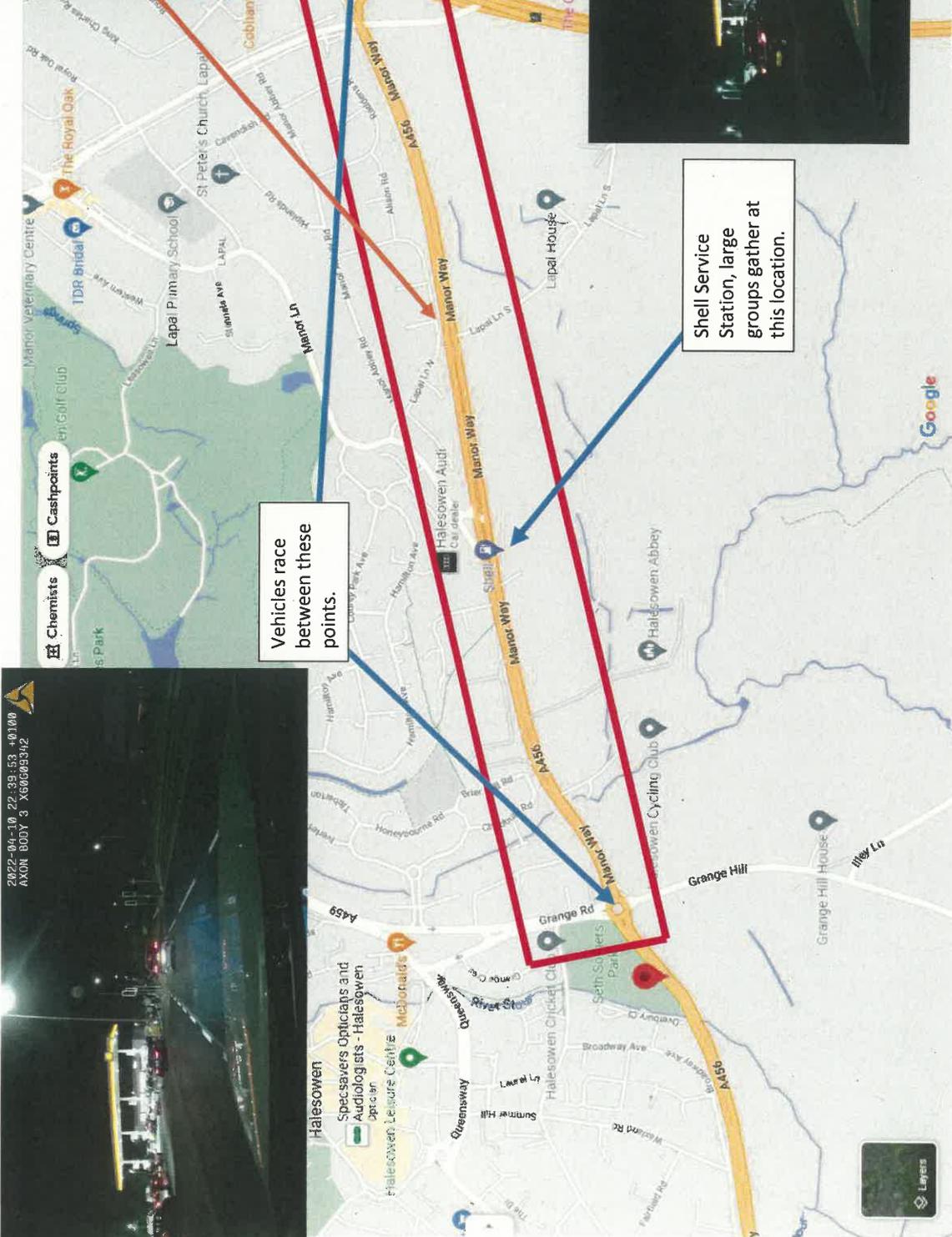
This is the document referred to as "Exhibit MRC3" in the witness statement of Mark Campbell dated 13 July 2022.

Black Country Local Authority injunction application.



Exhibit ref no MRC/3

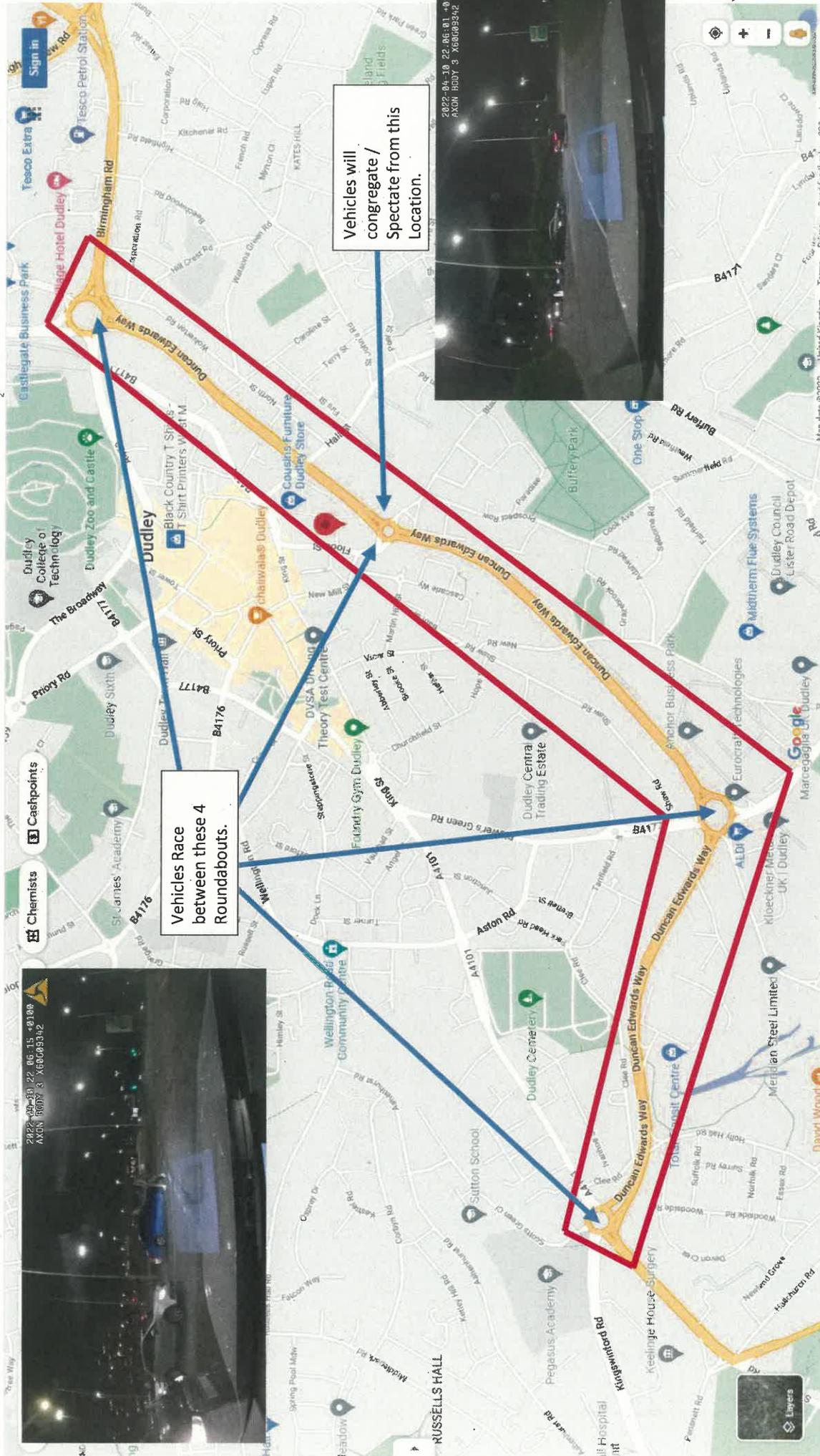
Booklet containing 7 maps.



Vehicles race between these points.

Shell Service Station, large groups gather at this location.





Vehicles will congregate / Spectate from this Location.

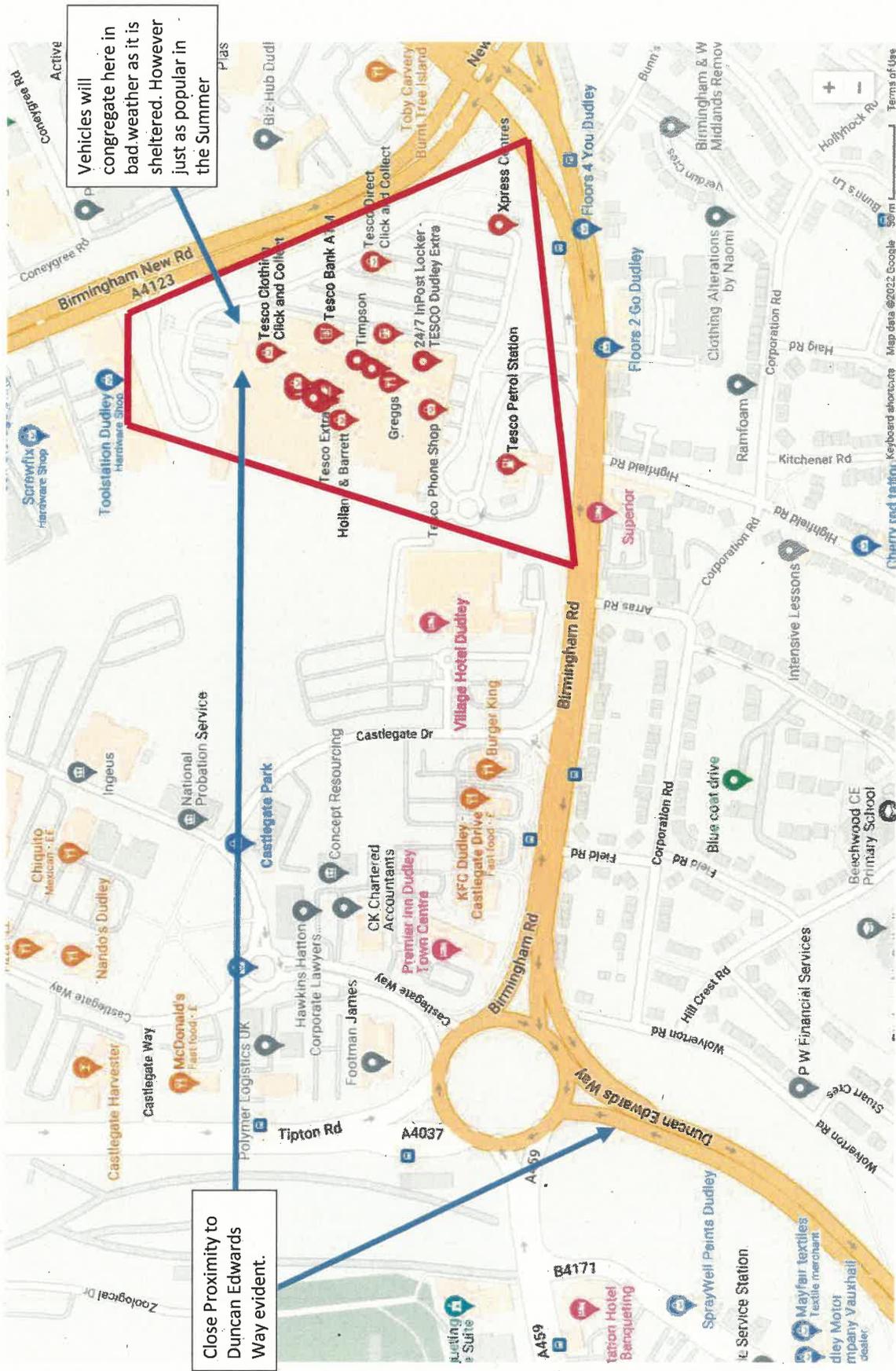
Vehicles Race between these 4 Roundabouts.



Duncan Edwards Way, Dudley.



Waterfront Way, Dudley.



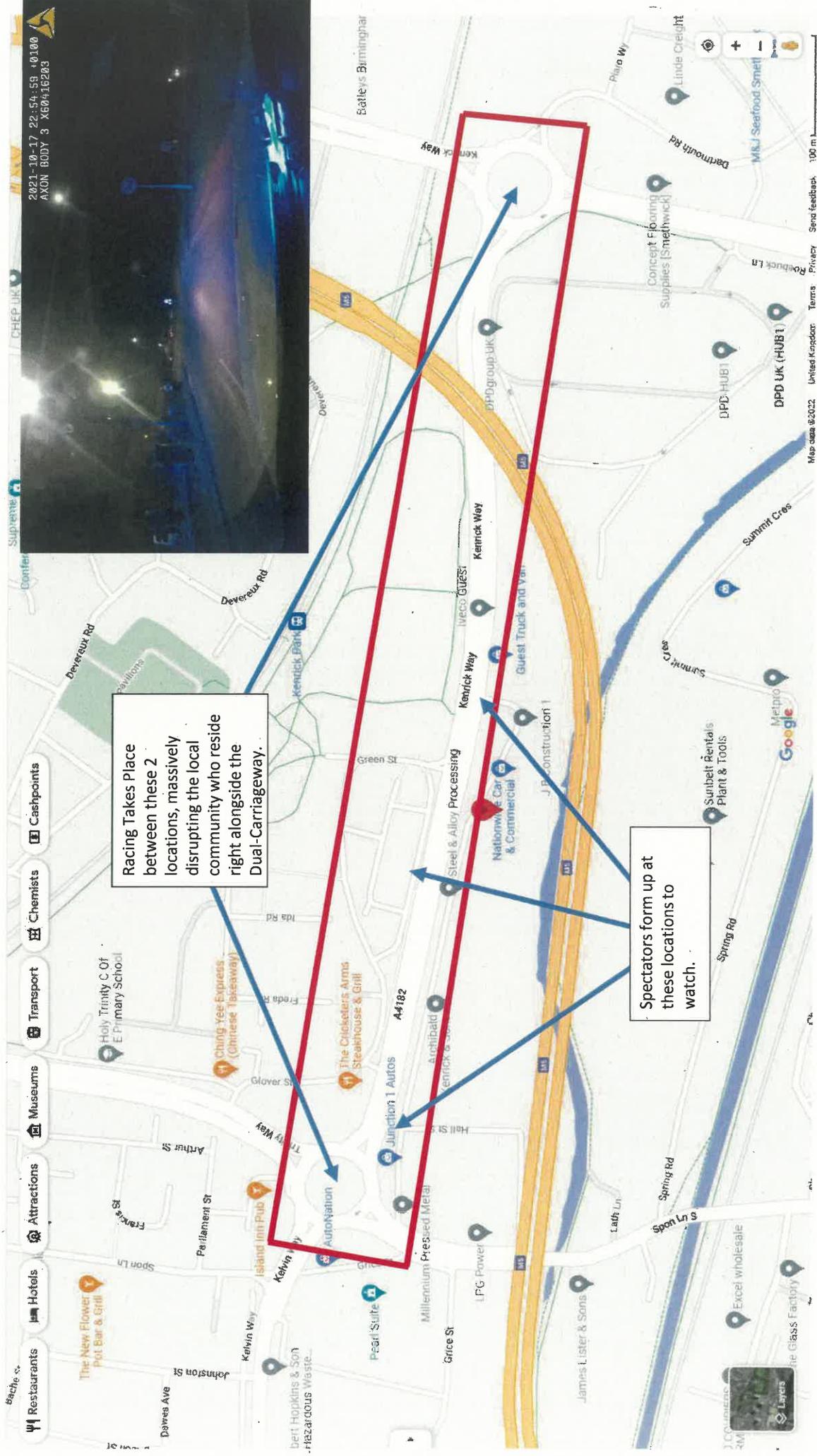
Vehicles will congregate here in bad weather as it is sheltered. However just as popular in the Summer

Close Proximity to Duncan Edwards Way evident.

TESCO, Birmingham Road.



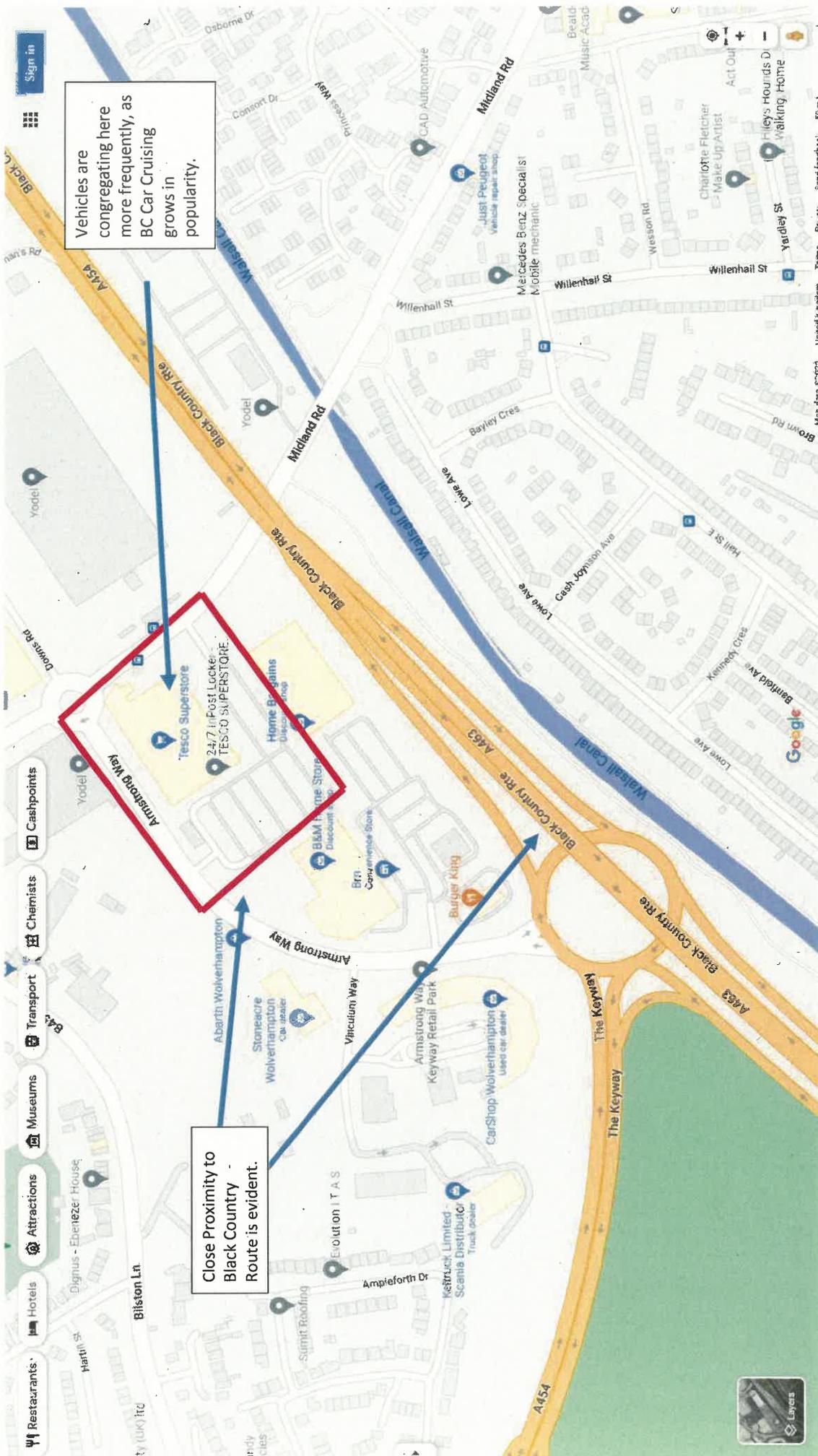
2021-10-17 22:54:59 +0100
AXON BODY 3 X60416203



Racing Takes Place between these 2 locations, massively disrupting the local community who reside right alongside the Dual-Carriageway.

Spectators form up at these locations to watch.

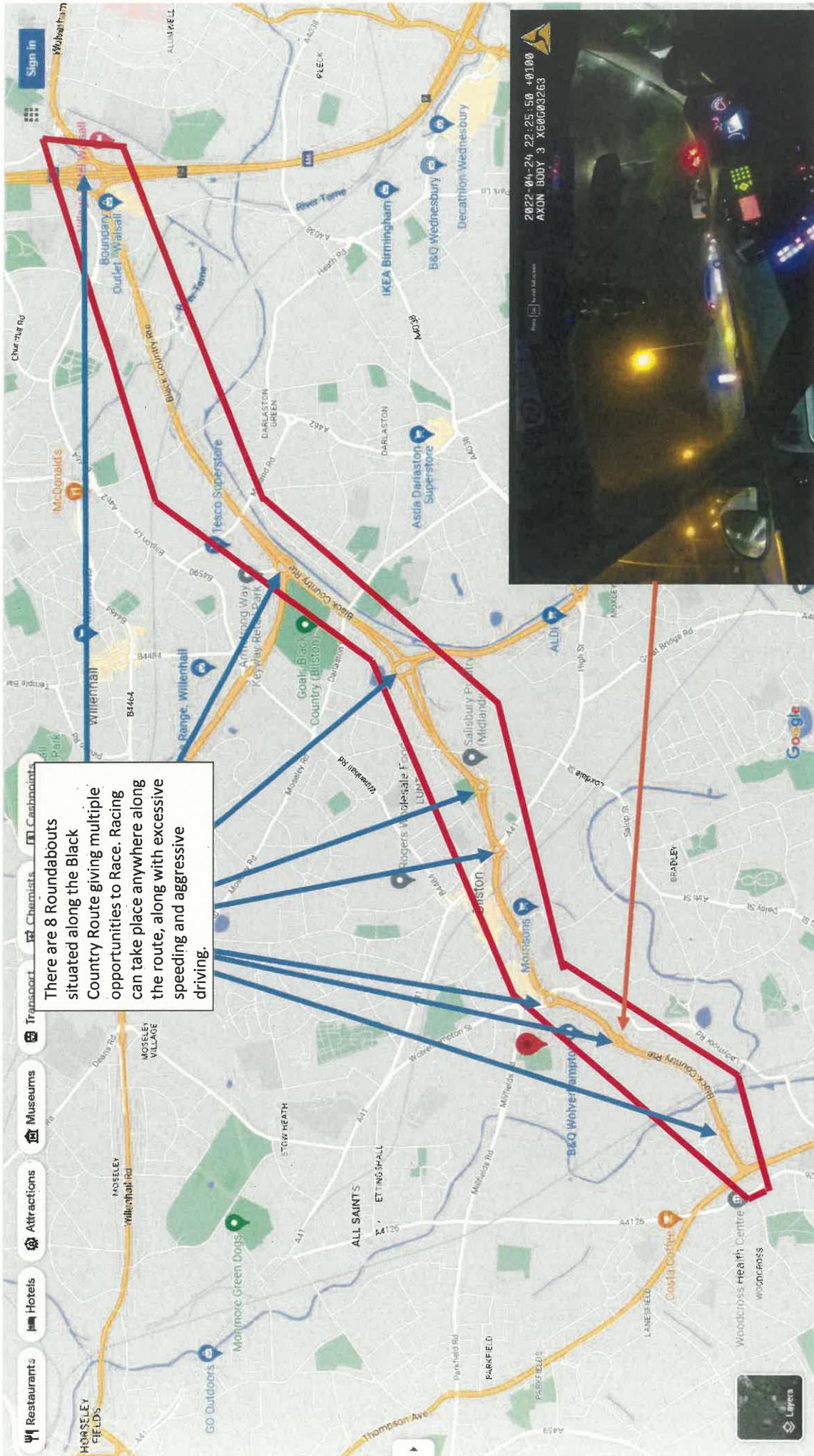
Kenrick Way, West Bromwich



Vehicles are congregating here more frequently, as BC Car Cruising grows in popularity.

Close Proximity to Black Country Route is evident.

TESCO, Willenhall.



Black Country Route.

i) Statement of: Paul Brown
ii) Statement No: 1
iii) For: Claimants
iv) Dated: 16.9.2022
v) Exhibits: PB1

**IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION**

CLAIM NO:

B E T W E E N:

**(1) WOLVERHAMPTON CITY COUNCIL
(2) DUDLEY METROPOLITAN BOROUGH COUNCIL
(3) SANDWELL METROPOLITAN BOROUGH COUNCIL
(4) WALSALL METROPOLITAN BOROUGH COUNCIL**

Claimants

and

PERSONS UNKNOWN

Defendants

WITNESS STATEMENT OF PAUL STEVEN BROWN

I, PAUL STEVEN BROWN of the City of Wolverhampton Council, Civic Centre, St Peter's Square, Wolverhampton, WV1 1RG WILL SAY AS FOLLOWS:

1. Except where indicated to the contrary, the facts in this statement are within my knowledge and are true. Where the facts in this statement are not within my direct knowledge, they are based on the source indicated and are true to the best of my information and belief.
2. The City of Wolverhampton Council is the authority which is leading the joint application of the Councils of Wolverhampton, Dudley, Sandwell and Walsall (hereinafter referred to as the "Black Country Boroughs") seeking injunctive relief to restrain street racing in the Black Country Boroughs.

3. I have been employed since 25 June 2007 as a Senior Communications Adviser and latterly Communications Manager in the communications team of the City of Wolverhampton Council.
4. In collaboration with my colleagues Pardip Nagra (ASB Team Leader) and Adam Sheen (Senior Solicitor, Legal Services) a communications plan has been developed, with the initial steps implemented, initially to raise awareness of the application to the High Court for a new street racing injunction for the Black Country Area and, should the court be minded to grant this, to promote the existence of the injunction, and the power of arrest, once it is formally in place.
5. Recognising this is a joint enterprise, I have been liaising closely with my counterparts in the communications teams of Dudley, Sandwell and Walsall Councils and West Midlands Police.
6. For ease of reference, the communications plan is attached as "**Exhibit PB1**", with associated appendices.

STATEMENT OF TRUTH

I believe that the facts stated in this Witness Statement are true. I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without and honest belief in its truth

Full Name: PAUL STEVEN BROWN Position: COMMUNICATIONS
MANAGER

Name of Claimant: City of Wolverhampton Council

Signed



Print Name **PAUL STEVEN BROWN**

Dated **16/9/2022**

i) Statement of: Paul Brown
ii) Statement No: 1
iii) For: Claimants
iv) Dated: 16.9.2022
v) Exhibits: PB1

**IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION**

CLAIM NO:

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(2) DUDLEY METROPOLITAN BOROUGH COUNCIL
(3) SANDWELL METROPOLITAN BOROUGH COUNCIL
(4) WALSALL METROPOLITAN BOROUGH COUNCIL**

Claimants

and

PERSONS UNKNOWN

Defendants

EXHIBIT PB1

This is the document referred to as "**Exhibit PB1**" in the witness statement of Paul Brown dated 16 September 2022.

PROTECT

Street Racing Injunction Communications Plan

Research

1. Areas throughout the Black Country have witnessed the regular congregation of 'street racers' over many years. Street racing is also known as car cruising.
2. The issue is a bone of contention with local residents and businesses with complaints received about dangerous driving, driving at speed, excessive noise from revving engines and music systems, littering, verbal abuse, swearing and intimidation.
3. Street racing – the act of drivers meeting on the public highways on an organised or impromptu basis to race and/or show off their cars - is noisy, dangerous and illegal, obstructing highways and the premises bordering them, damaging property and putting spectators (adults and children) or other road users at risk of injury or worse; there have been a number of road traffic collisions because of street racing.
4. This activity cuts across the four Black Country boroughs of Sandwell, Dudley, Walsall and Wolverhampton, with up to 250 vehicles at each gathering and crowds of spectators along the route.
5. The Community Safety Partnerships of Sandwell, Dudley, Walsall and Wolverhampton together with the West Midlands Police and other agencies are responsible for formulating and implementing a strategy for the reduction of crime and disorder in their respective areas pursuant to Sections 5 and 6 of the Crime and Disorder Act 1998.
6. A huge amount of police resource has been dedicated to address this issue. Enforcement action, including prosecution against vehicles in dangerous condition, no insurance etc, has not contributed to any long term reduction of anti-social vehicles.
7. In response to evidence of possible displacement of the problem across the Black Country because of police operations, and to maximise the impact of measures against street racing, a group approach was taken to seek an injunction to prevent groups meeting anywhere in the Black Country.
8. Served against persons unknown, this was introduced in 2015 and, over its six-year lifespan, had a demonstrable effect in reducing instances of street racing and, in some areas, eliminating it altogether.
9. Following its lapsing in 2021, the issue has begun to arise once more, and therefore the partners are returning to the High Court to seek new injunctive relief.

Objectives

1. Raise awareness of the application for an injunction preventing street racing activities anywhere in the Black

PROTECT

- Country among people intending to organise, take part in or spectate at a planned gathering.
2. Upon granting of the injunction, raise awareness of existence and application of the injunction preventing street racing activities anywhere in the Black Country among people intending to organise, take part in or spectate at a planned gathering.
3. Enable the injunction to be served to “persons unknown” by ensuring authorities have done all they can to make people aware of its existence.
4. Reassure residents and businesses that measures are in place to prevent street racing throughout the Black Country.
5. Improve engagement between partner agencies on the issue of street racing.
6. Signpost residents and businesses to the mechanisms available in which to report instances of street racing.
7. Help bring about a reduction in instances of street racing in the Black Country.

Strategy

1. Develop, with partner authorities across the Black Country including Dudley Council, Sandwell Council, Walsall Council and West Midlands Police, a planned and sustained communications campaign which maximises opportunities and manages risks.
2. Using a variety of traditional and social media, raise awareness of the existence of the injunction, and its ramifications for people intending to take part in or spectate at a street racing meeting.
3. Development of a range of materials to highlight injunction and power of arrest.
4. Improve relationship between partners through proactive stakeholder engagement.

Key stakeholders – internal: Council officers – legal, enforcement, Anti-Social Behaviour unit, highways, Cabinet lead, wider Cabinet, local ward councillors, wider council employees.

Key stakeholders – partners: City of Wolverhampton Council, Dudley Council, Sandwell Council, Walsall Council, West Midlands Police, Highways Agency.

Key stakeholders – external: Street race organisers, participants and spectators, local residents, local schools, local businesses, taxpayers, media (Express & Star, Wolverhampton Chronicle, Birmingham Mail, BBC WM, WCR FM, Signal 107, Free Radio, BBC Midlands Today, ITV Central), social media (Twitter, Facebook and Instagram), local MPs.

Implementation

1) Corporate spokespeople:

- Cabinet lead and media spokespeople: Councillor Jasbir Jaspal, the City of Wolverhampton Council's Cabinet Member for Public Health and Wellbeing; Councillor Obaida Ahmed, the City of Wolverhampton Council's Cabinet Member for Resources and Digital City (Note, partner councils will have their own Cabinet Members who will front this in their locations).
- Council SEB lead: John Denley, Director of Public Health (Note, partner councils will have their own officers who will lead on their behalf).
- Internal/external communications lead: Paul Brown (City of Wolverhampton Council), Chris Horst chris_horst@sandwell.gov.uk (Sandwell Council), Melinder Kaur melinder.kaur@walsall.gov.uk (Walsall) press.office@dudley.gov.uk, corporate_communications@westmidlands.police.uk.

2) Key messages:

- The regular congregation of 'street racers' in the Black Country has been a bone of contention with local residents, local businesses and employees, particularly over many years.
- Street racers – drivers who meet on public highways including the Black Country Route and Black Country New Road and race or show off their cars – pose a great danger. The activities are noisy, dangerous and illegal, obstructing highways and the premises bordering them, damaging property and putting spectators, including children as young as seven, or other road users at risk of injury or worse. It's only a matter of time until someone is killed or seriously injured.
- As many as 250 vehicles at a time meet for these gatherings, usually on Sunday nights, together with crowds of spectators who line the route.
- Complaints have been received by local councils and police about dangerous driving and driving at excessive speeds, excessive noise from revving engines, horns and music systems, verbal abuse and swearing, drug use and intimidation. This is clearly affecting the quality of life of people who have to put up with the problem.
- A huge amount of police resource has been dedicated in an attempt to address this issue – particularly at weekends when demand on police time is already very high – and it is clear that targeting the issue on a location-by-location basis would only going to displace the problem to another areas, and so the four Black Country

PROTECT

boroughs – Wolverhampton, Dudley, Sandwell and Walsall councils – have teamed up with West Midlands Police to tackle the issue on a Black Country-wide basis.

- An injunction was served by the High Court which prohibited groups meeting for street races anywhere within the Black Country. In effect between 2015 and 2021, it had a demonstrable effect in reducing instances of street racing and, in some areas, eliminating it altogether.
- Following its lapsing in 2021, the issue has begun to arise once more, and therefore the partners are returning to the High Court to seek new injunctive relief.
- The injunction will be served against “persons unknown”, and so an individual or individuals suspected of breaching the injunction don’t have to be served personally with it.
- The Black Country councils and West Midlands Police will actively promote the existence of this injunction in a wide variety of ways to ensure, as far as possible, people involved in street racing – either as an organiser, participant, or spectator – aware that the activity is prohibited throughout Dudley, Sandwell, Walsall and Wolverhampton.
- Anyone suspected of breaching the injunction will be in contempt of court, for which an adult can face up to two years in prison and/or a fine. In addition, police will retain their powers in relation to traffic offences including driving without insurance, driving an unroadworthy vehicle and driving without due care and attention.
- Street racing is also sometimes known as car cruising, and both terms will be used within much of the communications, with street racing being the primary description of this activity.

3) Action Plan

- See Action Plan, below – note, this is in two parts, the first relating to the steps that will be taken to publicise the application for an injunction to the High Court, the second the steps that will be taken to publicise the existence and application of the injunction once granted and then implemented.
- To be reviewed after six months.

4) Budget

- Has been identified.

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Evaluation

1. Number of positive stories about street racing injunction both prior to and post implementation in local media – target of at least eight across range of media.
2. Social media reach and engagement levels on postings relating to street racing (comments, likes, shares)
3. Reports of instances of street racing from individuals and businesses
4. Plan delivered on timescale and to budget.

ACTION PLAN

APPLICATION FOR INJUNCTION MADE TO COURT				
Step	Action	When	Who	Completed
1	Media release announcing intention to apply to the High Court for a new street racing injunction, and asking people to submit details of street racing incidents in their area which could be included as evidence. Please see Appendix 1, the media release which was issued on 4 July 2022. Please also see note 1) below, detailing distribution of the media release. See also resulting covering in the Express & Star newspaper: https://www.expressandstar.com/news/crime/2022/07/04/new-ban-sought-on-street-racing-in-black-country/ and Birmingham Mail: https://www.birminghammail.co.uk/black-country/street-racing-ban-sought-black-24394456	4/7/22	PB	Yes
2	Social media linking to above media release announcing intention to apply to the High Court for a new street racing injunction. Please see Appendix 2, examples of social media issued by the City of Wolverhampton Council, Dudley Council, Sandwell Council, Walsall Council and West Midlands Police.	4/7/22	All	Yes
3	Media release reporting large number of responses to appeal for people to submit details of street racing incidents in their area which could be included as evidence. Please see Appendix 3, the media release which was issued on 25 July 2022. Please also see note 1) below, detailing distribution of the media release. See also resulting covering in the Express & Star newspaper: https://www.expressandstar.com/news/local-hubs/wolverhampton/2022/07/25/anti-social-noisy-and-dangerous-black-country-councils-seeking-street-racing-ban/ and Birmingham Mail: https://www.birminghammail.co.uk/black-country/street-racers-wreak-havoc-black-24579644	25/7/22	PB	Yes
4	Social media linking to above media release reporting large number of responses. Please see Appendix 4, examples of social media issued by the City of Wolverhampton Council, Dudley Council, Sandwell Council and Walsall Council.	25/7/22	All	Yes

PROTECT

5	Media release reminding public of intention to apply for new injunction. Please see Appendix 5, the media release which was issued on 25 August, 2022. Please also see note 1) below, detailing distribution of the media release. See also resulting covering in the Express & Star newspaper: https://www.expressandstar.com/news/local-hubs/wolverhampton/2022/08/25/final-touches-being-put-on-paperwork-to-ban-street-racing-in-the-black-country/ and Birmingham Mail: https://www.birminghammail.co.uk/black-country/new-street-racing-ban-sought-24852070	25/8/22	PB	Yes
6	Social media linking to above media release reporting intention to apply for new injunction. Please see Appendix 6, examples of social media issued by the City of Wolverhampton Council, Dudley Council, Sandwell Council and Walsall Council.	25/8/22	All	Yes
7	Refresh of the existing street racing pages on the websites for the four councils to announce intention to make a fresh application. Please see updated webpages: https://www.wolverhampton.gov.uk/street-racing-injunction . https://www.dudley.gov.uk/residents/parking-and-roads/roads-highways-and-pavements/car-cruising-injunction/ https://www.sandwell.gov.uk/info/200284/roads-travel-and-parking/3231/street-racing https://go.walsall.gov.uk/black-country-car-cruising-injunction	31/8/22	All	Yes
8	Publication of details of application to the High Court on the websites of the four councils and West Midlands Police, detailing the date of the hearing and the court's address, and associated documents as required.	Within three working days of receipt of the sealed order from the court.	CWC legal/PB	
9	Media release announcing application to High Court for a new street racing injunction, detailing the date of the hearing and the court's address, and asking people to submit details of street racing incidents in their area which could be included as evidence. Please see indicative draft, Appendix 7, which will be amended as required prior to publication. Please also see note 1) below, detailing proposed distribution of the media release.	Within three working days of receipt of the sealed order from the court.	PB	
10	Social media linking to above media release announcing application to High Court for a new street racing injunction, detailing the date of the hearing and the court's address. Please see indicative drafts, Appendix 8, which will be amended as required prior to publication.	Within three working days of receipt of the sealed order from the court.	All	
11	Public notice in Express & Star announcing application to High Court for a new street racing injunction, detailing the date of the hearing and the court's address.	Within seven working days of the application being made to the court	CWC legal	
12	Creation of videos of terms of injunction, notice of court hearing and a summary of	Within seven working days of	PB	

PROTECT

	the case to ensure communications are inclusive and cater for those with literacy difficulties. To be published on claimants' websites and shared widely on social media.	receipt of the sealed order from the court.		
13	Media release shortly before court hearing, reminding people that an application for a new injunction will shortly be heard by the High Court, detailing the date of the hearing and the court's address. Please see indicative draft, exhibit Appendix 9, which will be amended as required prior to publication. Please also see note 1) below, detailing proposed distribution of the media release.	One week prior to hearing	PB	
14	Social media linking to above media release announcing imminent court hearing application to High Court for a new street racing injunction, detailing the date of the hearing and the court's address. Please see indicative drafts, Appendix 10, which will be amended as required prior to publication.	Within one working day of the above	All	
INTRODUCTION OF STREET RACING INJUNCTION				
Step	Action		Who	Completed
1	Media release highlighting granting of the High Court injunction and power of arrest and next steps for its introduction. Please see indicative draft, Appendix 11, which will be amended as required prior to publication. Please also see note 1) below, detailing proposed distribution of the media release.	To be issued by 4pm on the next working day after the date of the grant of any injunction	PB	
2	Social media linking to the above media release regarding the granting of the High Court injunction and power of arrest and next steps for its introduction highlighting introduction of injunction and power of arrest. Please see indicative drafts, Appendix 12, which will be amended as required prior to publication.	Within 1 working day of the above	All	
3	Update dedicated pages on the websites of Wolverhampton City Council, Dudley Council, Sandwell Council, Walsall Council and West Midlands Police about injunction and power of arrest, and date of introduction of the injunction.	Within three months of the date of the grant of any injunction	All	
4	Review and refresh of existing signage publicising the injunction and installation of new signage as necessary: Dudley's existing signs and proposed signs – see Appendix Signage 1 and 2; Sandwell's existing signs and proposed signs – see Appendix Signage 3 and 4; Walsall's existing signs and proposed signs – see Appendix Signage 5 and 6; Wolverhampton's existing signs and proposed signs – see Appendix Signage 7 and 8.	Within three months of the date of the grant of any injunction	CWC legal	
5	Production of A5 flyer detailing injunction and power of arrest. Please see indicative draft, Appendix 13, which will be amended as required prior to publication.	Within three months of the date of the grant of any injunction	PB	
6	File statement to court to confirm that the above steps have been completed. Note,	Within three months of the date	PB	

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	this will allow the confirmation of the date that the injunction will come into effect.	of the grant of any injunction		
7	Place a copy of the injunction and power of arrest in the Express & Star and Chronicle Week newspapers.	Day injunction comes into force. Note, this will be determined by 6, above.	CWC legal	
8	Use of electronic traffic signage on main routes in Wolverhampton, Dudley, Sandwell and Walsall to promote fact that a street racing injunction is in force in the Black Country Area, likely using wording such as "Street Racing is Banned in the Black Country". This message will be displayed on a rolling basis, along with the usual road safety/traffic information which is normally displayed, for the life of the injunction, with particular emphasis on those times when street racing is more likely to occur. Please see Appendix Digital Signage, which lists the electronic signage available in Wolverhampton and Walsall.	From day injunction comes into force and throughout life of injunction.	All	
9	Media release announcing that the new injunction and power of arrest is officially in place. Please see indicative draft, Appendix 14, which will be amended as required prior to publication. Please also see note 1) below, detailing proposed distribution of the media release.	Day injunction comes into force	PB	
10	Social media linking to above media release announcing that the new injunction and power of arrest is officially in place. Please see indicative drafts, Appendix 15, which will be amended as required prior to publication.	Within 1 working day of the above.	All	
11	Update to dedicated page on the websites of Wolverhampton City Council, Dudley Council, Sandwell Council, Walsall Council and West Midlands Police to make it clear that injunction is now in force.	Day injunction comes into force	All	
12	Publication of short film highlighting the injunction and power of arrest to be used via all partner channels.	Day injunction comes into force and on further occasions in the following weeks	PB	
13	Development of social media advertising campaign, to run for a period of four weeks and to target the demographic most likely to associate with street racing.	To launch within a week of the injunction coming into effect	PB	
14	Media release highlighting response to introduction of injunction and power of arrest including feedback on any initial impact it has had.	Two weeks after introduction of injunction	PB	
15	Regular social media activity to remind people of existence of injunction and power of arrest.	Throughout life of injunction – frequency to be determined by need/level of incidents of street racing	PB	
16	Consideration of further advertising, via social media or traditional media as necessary.	As required – to be considered on a monthly basis	PB	
17	Media release highlighting any successful prosecutions as result of injunction	As required	PB	

PROTECT

18	Review of communications plan and refresh	Six months after introduction of injunction	PB	

Notes:

1) Media releases are issued to an extensive distribution list which includes, but is not limited to, local print publications such as the Express and Star, Chronicle Week, the Birmingham Mail, Halesowen & Dudley News and Stourbridge News, local radio stations including BBC WM, Free Radio, Signal 107, WCR FM and Heart, and BBC Midlands Today and ITV Central. Releases are also issued to various hyperlocal community internet sites and national media outlets including PA and Sky News. Media releases are also distributed via other channels available to the claimants – in the case of the City of Wolverhampton Council, these include the website of the City of Wolverhampton Council (www.wolverhampton.gov.uk/news) and other mechanisms including, but not limited to, residents e-Bulletins, councillor bulletins and internal channels.

**IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION**

CLAIM NO:

B E T W E E N:

**(1) WOLVERHAMPTON CITY COUNCIL
(2) DUDLEY METROPOLITAN BOROUGH COUNCIL
(3) SANDWELL METROPOLITAN BOROUGH COUNCIL
(4) WALSALL METROPOLITAN BOROUGH COUNCIL**

Claimants

and

PERSONS UNKNOWN

Defendants

COMMUNICATIONS PLAN: APPENDIX ONE

Councils and police seek new ban on street racing in region

Released: Monday 4 July, 2022



Wolverhampton, Dudley, Sandwell and Walsall councils have announced they will be applying for a new High Court injunction to ban "street racing" in the Black Country.

Working in partnership with West Midlands Police, they will return to the High Court later this year to seek a ban on street racing, also known as car cruising, across the four boroughs.

If granted, the injunction would forbid people from participating in, attending, promoting, organising or publicising a street racing event. Anyone ignoring the injunction could be arrested, face penalties such as up to two years' imprisonment or an unlimited fine, or have their assets seized.

The councils are expected to issue proceedings in a few weeks' time, with a court date likely to be later this summer or early autumn.

For the purposes of the application, street racing is defined as the act of drivers of cars, motorbikes or quadbikes meeting to race or show off in their vehicles.

A similar injunction had previously been in force in the Black Country for a period of six years, and had helped dramatically reduce instances of street racing across the region in that time.

The new application is once again being led by the City of Wolverhampton Council on behalf of the four Black Country local authorities and West Midlands Police.

Councillor Jasbir Jaspal, the City of Wolverhampton Council's Cabinet Member for Public Health and Wellbeing, said: "Street racing is noisy, dangerous and illegal and some events have resulted in serious injuries and even death.

"Over the last few years, we and the police have received hundreds of complaints about dangerous driving, excessive noise, littering and people and vehicles obstructing highways and residential or business properties.

"Law abiding drivers can also feel intimidated when, through no fault of their own, they inadvertently find themselves in the middle of a street race.

"The previous Black Country-wide injunction proved incredibly effective in reducing instances of street racing across the region. However, the problem still persists in some areas, and has started to grow again since the original injunction expired.

"It is important that the authorities have the powers they need to crack down on street racing as and when it occurs and so we are pleased to be in a position where we will shortly launch new proceedings and are hopeful that we can secure an injunction as soon as possible."

People are invited to submit comments and observations regarding street racing and the application for a new injunction by emailing litigation@wolverhampton.gov.uk. Comments received may be presented as evidence to the High Court.

Incidents of street racing should be reported via asbu@wolverhamptonhomes.org.uk or to West Midlands Police on 101. In an emergency, always dial 999.

ENDS

Notes to editors:

1/ For more information or to arrange an interview, please contact Paul Brown, Communications Manager, on 01902 555497 or email paul.brown@wolverhampton.gov.uk.

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**IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION**

CLAIM NO:

B E T W E E N:

**(1) WOLVERHAMPTON CITY COUNCIL
(2) DUDLEY METROPOLITAN BOROUGH COUNCIL
(3) SANDWELL METROPOLITAN BOROUGH COUNCIL
(4) WALSALL METROPOLITAN BOROUGH COUNCIL**

Claimants

and

PERSONS UNKNOWN

Defendants

COMMUNICATIONS PLAN: APPENDIX TWO



Wolverhampton Today
Published by Orlo · 4 July · 🌐

Wolverhampton, Dudley, Sandwell and Walsall councils and West Midlands Police have announced they will be applying for a new High Court injunction to ban "street racing" in the Black Country.

If granted, the injunction would forbid people from participating in, attending, promoting, organising or publicising a street racing event. Anyone ignoring the injunction could be arrested, face penalties such as up to 2 years' imprisonment or an unlimited fine, or have their assets s... [See more](#)

[Edit](#)

👍 63 45 comments 57 shares

👍 Like 💬 Comment ➦ Share 🌐

View 20 previous comments Oldest ▾

Lisa Tromans
Yeah yeah
Like Reply Hide 4 w

Shaun Baggott
It pisses me off, When the police class car enthusiasts the same as boy racers. We pull up on a car

Comment as Wolverh... 🗨️ 📷 📧 📧 📧

Wolves Council ✓
@WolvesCouncil

[@WolvesCouncil](#), [@dudleymbc](#), [@sandwellcouncil](#), [@WalsallCouncil](#) & [@WMPolice](#) have announced they will be applying for a new High Court injunction to ban "street racing" in the Black Country. Full story: orlo.uk/bjPia



12:47 PM · Jul 4, 2022 · Orlo

Sandwell Council ✓ @sandwellcouncil · Jul 4

We're joining forces with [@dudleymbc](#), [@WalsallCouncil](#), [@WolvesCouncil](#) and [@WMPolice](#) to apply for a new High Court injunction to ban "street racing" in the Black Country 📌

Wolves Council ✓ @WolvesCouncil · Jul 4

[@WolvesCouncil](#), [@dudleymbc](#), [@sandwellcouncil](#), [@WalsallCouncil](#) & [@WMPolice](#) have announced they will be applying for a new High Court injunction to ban "street racing" in the Black Country. Full story: orlo.uk/bjPia



🗨️ 1 📷 7 ❤️ 15 📧

Sandwell 4 July · 🌐

We're joining forces with Wolverhampton, Dudley and Walsall councils and West Midlands Police to apply for a new High Court injunction to ban "street racing" in the Black Country 📌



Wolverhampton Today
4 July · 🌐

Wolverhampton, Dudley, Sandwell and Walsall councils and West Midlands Police have announced they will be applying for a new High Court injunction to ban "stree... [See more](#)

👍 78 11 comments 5 shares

Our Walsall 4 July · 🌐

Read more about the new High Court injunction application to ban 'street racing' in the Black Country 📌



Wolverhampton Today
4 July · 🌐

Wolverhampton, Dudley, Sandwell and Walsall councils and West Midlands Police have announced they will be applying for a new High Court injunction to ban "stree... [See more](#)

👍 10

Walsall Council @WalsallCouncil · Jul 4

Read more about the new High Court injunction application to ban 'street racing' in the Black Country 📌

Wolves Council ✓ @WolvesCouncil · Jul 4

[@WolvesCouncil](#), [@dudleymbc](#), [@sandwellcouncil](#), [@WalsallCouncil](#) & [@WMPolice](#) have announced they will be applying for a new High Court injunction to ban "street racing" in the Black Country. Full story: orlo.uk/bjPia



🗨️ 📷 ❤️ 242 📧



Wolverhampton Today
4 July · 🌐
Wolverhampton, Dudley, Sandwell and Walsall councils and West Midlands Police have announced they will be applying for a new High Court injunction to ban "stree... [See more](#)

👍 4

Wolverhampton Today
4 July · 🌐
Wolverhampton, Dudley, Sandwell and Walsall councils and West Midlands Police have announced they will be applying for a new High Court injunction to ban "stree... [See more](#)

👍 1 1 share

Wolverhampton Today
4 July · 🌐
Wolverhampton, Dudley, Sandwell and Walsall councils and West Midlands Police have announced they will be applying for a new High Court injunction to ban "stree... [See more](#)

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**IN THE HIGH COURT OF JUSTICE
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(2) DUDLEY METROPOLITAN BOROUGH COUNCIL
(3) SANDWELL METROPOLITAN BOROUGH COUNCIL
(4) WALSALL METROPOLITAN BOROUGH COUNCIL**

Claimants

and

PERSONS UNKNOWN

Defendants

COMMUNICATIONS PLAN: APPENDIX THREE

Street racing reports filed as councils build case for new injunction

Released: Monday 25 July, 2022



Authorities have been inundated with reports of street racing after it was announced that councils in the Black Country are set to seek a new ban on the activity.

Wolverhampton, Dudley, Sandwell and Walsall councils, together with West Midlands Police, will return to the High Court this autumn to apply for a new injunction prohibiting street racing, defined as the act of drivers of cars, motorbikes or quadbikes meeting to race or show off in their vehicles.

And the City of Wolverhampton Council, which is leading on the application, has received numerous comments from residents and businesses after it invited observations regarding street racing from members of the public.

Reports have been filed of street racing activities at Waterfront Business Park in Merry Hill, on Mill Race Lane, Stourbridge, on the Halesowen bypass, on West Bromwich Road in Walsall, on Blackwood Avenue, Wednesfield and on Trinity Way, West Bromwich.

The council has also received reports of street racing activities in Aldridge, on Spring Vale Business Park, Bilston, on Essington Road, New Invention and along the A34 between Walsall and Broadway.

The council is expected to issue proceedings for the new injunction in the next few weeks, with a court date likely to be later this summer or early autumn.

A similar injunction had previously been in force in the Black Country between 2015 and 2021 and helped dramatically reduce instances of street racing across the region.

Councillor Jasbir Jaspal, the City of Wolverhampton Council's Cabinet Member for Public Health and Wellbeing, said: "The sheer number of comments we have received over the last couple of weeks shows just how much of an issue street racing continues to be in the Black Country, and why it is so important that we seek a fresh injunction to ban it.

"Let's be very clear, street racing is anti-social, noisy and dangerous, and from the feedback we are getting we can very clearly see the impact it is having on people and businesses that have to put up with it.

"The previous Black Country-wide injunction proved very effective in reducing instances of street racing across the region. But the problem still persists in some areas and is starting to grow once more.

"We want to ensure that the authorities, whether that is the police or local councils, have the powers they need to crack down on street racing as and when it occurs.

"The evidence we have received since announcing our intention to seek a new injunction is helping us to build our case, and I would encourage anyone who has witnessed incidents of street racing in the Black Country to get in touch and share their experiences, if they haven't already."

People are invited to submit comments and observations regarding street racing and the application for a new injunction by emailing litigation@wolverhampton.gov.uk. Comments received may be presented as evidence to the High Court.

Incidents of street racing should be reported via asbu@wolverhamptonhomes.org.uk or to West Midlands Police on 101. In an emergency, always dial 999.

ENDS

Notes to editors:

1/ For more information or to arrange an interview, please contact Paul Brown, Communications Manager, on 01902 555497 or email paul.brown@wolverhampton.gov.uk.

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(2) DUDLEY METROPOLITAN BOROUGH COUNCIL
(3) SANDWELL METROPOLITAN BOROUGH COUNCIL
(4) WALSALL METROPOLITAN BOROUGH COUNCIL**

Claimants

and

PERSONS UNKNOWN

Defendants

COMMUNICATIONS PLAN: APPENDIX FOUR



Wolverhampton Today
Published by Orlo · 25 July at 15:11 ·

The council has been inundated with reports of street racing after it was announced that authorities in the Black Country are set to seek a new ban on the activity.

The four local councils, together with West Midlands Police, will return to the High Court this autumn to apply for a new injunction prohibiting street racing, defined as the act of drivers of cars, motorbikes or quadbikes meeting to race or show off in their vehicles.

Since announcing the news, authorities have...
[See more](#)

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Andy Finch
South Staffordshire Council come on....why you not on board !!!!
Like Reply Hide 21 h

Michal Malon
Thanks for letting everyone know.

Comment as Wolverh...

Wolves Council
@WolvesCouncil

We have been inundated with reports of street racing after we announced that we, @dudleymbc, @sandwellcouncil, @WalsallCouncil and @WMPolice are seek a new ban on the activity. Full story: orlo.uk/KmGcM (1/4)

3:12 PM · Jul 25, 2022 · Orlo

[View Tweet analytics](#)

Sandwell
8 August at 12:39 ·

Wolverhampton Today
25 July ·

The council has been inundated with reports of street racing after it was announced that authorities in the Black Country are set to seek a new ban on the activ... [See more](#)

24 · 22 comments · 4 shares

Our Walsall
25 August at 14:39 ·

Wolverhampton Today
25 August at 13:01 ·

The four Black Country local authorities and West Midlands Police are in the process of applying for a new High Court injunction to ban street racing, also know... [See more](#)

3 · 3 comments · 4 shares

Dudley borough
3 August ·

We're working with our fellow Black Country authorities to apply for a new injunction to prohibit street racing

Wolverhampton Today
25 July ·

The council has been inundated with reports of street racing after it was announced that authorities in the Black Country are set to seek a new ban on the activ... [See more](#)

24 · 21 comments · 1 share



Dudley Council @dudleymbc · Aug 3

We're working with our fellow Black Country authorities to apply for a new injunction to prohibit **street racing**

Wolves Council @WolvesCouncil · Jul 25
We have been inundated with reports of street racing after we announced that we, @dudleymbc, @sandwellcouncil, @WalsallCouncil and @WMPolice are seek a new ban on the activity. Full story: orlo.uk/KmGcM (1/4)
[Show this thread](#)



**IN THE HIGH COURT OF JUSTICE
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(2) DUDLEY METROPOLITAN BOROUGH COUNCIL
(3) SANDWELL METROPOLITAN BOROUGH COUNCIL
(4) WALSALL METROPOLITAN BOROUGH COUNCIL**

Claimants

and

PERSONS UNKNOWN

Defendants

COMMUNICATIONS PLAN: APPENDIX FIVE

Councils and police in application for new street racing ban

Released: Thursday 25 August, 2022



The four Black Country local authorities and West Midlands Police are in the process of applying for a new High Court injunction to ban "street racing" in the Black Country.

The final touches are currently being put to paperwork and will be filed with the High Court in the next few weeks, with a hearing date likely this autumn.

The application is being led by the City of Wolverhampton Council and will seek a ban on street racing, also known as car cruising, across the four boroughs.

If granted, the injunction would forbid people from participating in, attending, promoting, organising or publicising a street racing event. Anyone ignoring the injunction could be arrested, face penalties such as up to two years' imprisonment or an unlimited fine, or have their assets seized.

For the purposes of the application, street racing is defined as the act of drivers of cars, motorbikes or quadbikes meeting to race or show off in their vehicles.

A similar injunction was previously in force in the Black Country for a six year period, and helped dramatically reduce instances of street racing across the region in that time.

Councillor Jasbir Jaspal, the City of Wolverhampton Council's Cabinet Member for Public Health and Wellbeing, said: "Street racing is noisy, dangerous and illegal and some events have resulted in serious injuries and even death.

“Over the last few years, we and the police have received hundreds of complaints about dangerous driving, excessive noise, littering and people and vehicles obstructing highways and residential or business properties.

“The previous Black Country-wide injunction proved incredibly effective in reducing instances of street racing across the region but, since it lapsed in 2021, the problem has started to grow once more.

“We are pleased that we will shortly be in a position to issue proceedings to seek a new injunction which, if granted, will once again give councils and the police the powers they need to crack down on street racing as and when it occurs.

“This is a very important piece of work, and we are working closely with our council and police colleagues across the Black Country to ensure the case for a new injunction that we will put to the High Court is as robust as it can possibly be.”

People are invited to submit comments and observations regarding street racing and the application for a new injunction by emailing litigation@wolverhampton.gov.uk. Comments received may be presented as evidence to the High Court.

Incidents of street racing should be reported via asbu@wolverhamptonhomes.org.uk or to West Midlands Police on 101. In an emergency, always dial 999.

Full details of the application will be published at www.wolverhampton.gov.uk/street-racing-injunction in due course.

ENDS

Notes to editors:

1/ For more information or to arrange an interview, please contact Paul Brown, Communications Manager, on 01902 555497 or email paul.brown@wolverhampton.gov.uk.

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**IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION**

CLAIM NO:

B E T W E E N:

**(1) WOLVERHAMPTON CITY COUNCIL
(2) DUDLEY METROPOLITAN BOROUGH COUNCIL
(3) SANDWELL METROPOLITAN BOROUGH COUNCIL
(4) WALSALL METROPOLITAN BOROUGH COUNCIL**

Claimants

and

PERSONS UNKNOWN

Defendants

COMMUNICATIONS PLAN: APPENDIX SIX



Wolverhampton Today
Published by Orlo · 25 August at 13:01 · ...

The four Black Country local authorities and West Midlands Police are in the process of applying for a new High Court injunction to ban street racing, also known as car cruising, in the Black Country.

The final touches are currently being put to paperwork and will be filed with the High Court in the next few weeks, with a hearing date likely this autumn.

The proposed injunction would forbid people from participating in, attending, promoting, organising or publicising a stre... See more

Edit

23 11 comments 10 shares

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Ash Best
Shouldn't any motorist who speeds and drives dangerously be caught and punished not just those in modified cars? Meeting up with friends in cars isn't illegal but dangerous driving is. I know for a fact there will be 3 or more cars meeting up and maybe... See more

Like Reply Hide 2w

Mark R Pile
Back in 2003 lol I sort of kind of was heavily in the scene even had my own shop in Brierley hill.

Comment as Wol...

Sandwell
1 September at 11:46 · ...

Wolverhampton Today
25 August at 13:01 · ...

The four Black Country local authorities and West Midlands Police are in the process of applying for a new High Court injunction to ban street racing, also know... See more

15 comments 1 share

Our Walsall
25 August at 14:39 · ...

Wolverhampton Today
25 August at 13:01 · ...

The four Black Country local authorities and West Midlands Police are in the process of applying for a new High Court injunction to ban street racing, also know... See more

3 3 comments 4 shares

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Walsall Council Retweeted
Wolves Council @WolvesCouncil · Aug 25

We, @dudleymbc, @sandwellcouncil, @WalsallCouncil & @WMPolice are in the process of applying for a new High Court injunction to ban street racing, also known as car cruising, in the Black Country. Full story: orlo.uk/Kk5Wu #streetracing #carcruising #injunction

2 7

Dudley Council Retweeted
Wolves Council @WolvesCouncil · Aug 25

We, @dudleymbc, @sandwellcouncil, @WalsallCouncil & @WMPolice are in the process of applying for a new High Court injunction to ban street racing, also known as car cruising, in the Black Country. Full story: orlo.uk/Kk5Wu #streetracing #carcruising #injunction

2 7

**IN THE HIGH COURT OF JUSTICE
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(3) SANDWELL METROPOLITAN BOROUGH COUNCIL
(4) WALSALL METROPOLITAN BOROUGH COUNCIL**

Claimants

and

PERSONS UNKNOWN

Defendants

COMMUNICATIONS PLAN: APPENDIX SEVEN

Councils and police in court to seek new ban on street racing

Released: TBC



The four Black Country councils and West Midlands Police will appear before the High Court on (DATE) to apply for a new injunction to ban "street racing" across the region.

If successful, the injunction will prohibit people from participating in, attending, promoting, organising or publicising a street racing event, also known as car cruising, anywhere within the boroughs of Wolverhampton, Dudley, Sandwell or Walsall.

Anyone ignoring the injunction could be arrested, face penalties such as up to two years' imprisonment or an unlimited fine, or have their assets seized.

For the purposes of the application, street racing is defined as the act of drivers of cars, motorbikes or quadbikes meeting to race or show off in their vehicles.

A similar injunction had previously been in force in the Black Country between 2015 and 2021, and had helped dramatically reduce instances of street racing across the region in that time.

The new application is once again being led by the City of Wolverhampton Council on behalf of the four Black Country councils and West Midlands Police.

Councillor Jasbir Jaspal, the City of Wolverhampton Council's Cabinet Member for Public Health and Wellbeing, said: "We are pleased to be returning to the High Court on (DATE) to seek a new injunction against street racing in the Black Country.

“Street racing, also sometimes described as car cruising, is noisy, dangerous and illegal and some events have resulted in serious injuries and even death.

"The previous Black Country-wide injunction proved incredibly effective in reducing instances of street racing across the region. However, the problem still persists in some areas, and has started to grow again since the original injunction expired.

“Since announcing our intention to seek a new injunction, we have been inundated with comments from residents and businesses whose lives are still being blighted by street racing, with evidence of dangerous driving, excessive noise, littering and people and vehicles obstructing highways and properties. These have helped us build what we believe to be an overwhelming case for the injunction.

"It is important that the authorities have the powers they need to crack down on street racing as and when it occurs and so we are naturally hopeful that we can secure this new injunction as soon as possible."

The application will be heard at Birmingham High Court on (DATE). For more information, including details of full terms of the proposed injunction and evidence in support of the application, please visit <http://bit.ly/street-racing-injunction>.

People are invited to submit comments and observations regarding street racing and the application for a new injunction by emailing litigation@wolverhampton.gov.uk.

Incidents of street racing should be reported via asbu@wolverhamptonhomes.org.uk or to West Midlands Police on 101. In an emergency, always dial 999.

ENDS

Notes to editors:

1/ For more information or to arrange an interview, please contact Paul Brown, Communications Manager, on 01902 555497 or email paul.brown@wolverhampton.gov.uk.

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**IN THE HIGH COURT OF JUSTICE
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CLAIM NO:

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(2) DUDLEY METROPOLITAN BOROUGH COUNCIL
(3) SANDWELL METROPOLITAN BOROUGH COUNCIL
(4) WALSALL METROPOLITAN BOROUGH COUNCIL**

Claimants

and

PERSONS UNKNOWN

Defendants

COMMUNICATIONS PLAN: APPENDIX EIGHT



Social media to accompany media release announcing High Court hearing date

TWITTER

We, together with @dudleymbc, @sandwellcouncil, @WalsallCouncil & @WMPolice are applying for new High Court injunction to ban "street racing" in the Black Country. Full story: XXXX (1/3)

If successful, the injunction will prohibit people from participating in, attending, promoting, organising or publicising a street racing event (AKA car cruising), anywhere within the boroughs of Wolverhampton, Dudley, Sandwell or Walsall. (2/3)

The application will be heard at Birmingham High Court on (DATE). For more information, including details of full terms of the proposed injunction and evidence in support of the application, please visit www.wolverhampton.gov.uk/street-racing-injunction. (3/3)

FACEBOOK

The four Black Country councils and West Midlands Police are applying for new High Court injunction to ban "street racing" in the region.

If successful, the injunction will prohibit people from participating in, attending, promoting, organising or publicising a street racing event (also known as car cruising), anywhere within the boroughs of Wolverhampton, Dudley, Sandwell or Walsall.

Councillor Jasbir Jaspal, Cabinet Member for Public Health and Wellbeing, said: "Street racing, also sometimes described as car cruising, is noisy, dangerous and illegal and some events have resulted in serious injuries and even death.

"A previous Black Country-wide injunction proved incredibly effective in reducing instances of street racing across the region. However, the problem still persists in some areas, and has started to grow again since the original injunction expired and so we are naturally hopeful that we can secure this new injunction as soon as possible."

The application will be heard at Birmingham High Court on (DATE). For more information, including details of full terms of the proposed injunction and evidence in support of the application, please visit www.wolverhampton.gov.uk/street-racing-injunction. Read more here: (LINK TO NEWS STORY)

INSTAGRAM

The four Black Country councils and West Midlands Police are applying for new High Court injunction to ban "street racing" in the region.

If successful, the injunction will prohibit people from participating in, attending, promoting, organising or publicising a street racing event (also known as car cruising), anywhere within the boroughs of Wolverhampton, Dudley, Sandwell or Walsall.

The application will be heard at Birmingham High Court on (DATE). For more information, including details of full terms of the proposed injunction and evidence in support of the application, please visit www.wolverhampton.gov.uk/street-racing-injunction. Read more here: (LINK TO NEWS STORY)

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**IN THE HIGH COURT OF JUSTICE
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(2) DUDLEY METROPOLITAN BOROUGH COUNCIL
(3) SANDWELL METROPOLITAN BOROUGH COUNCIL
(4) WALSALL METROPOLITAN BOROUGH COUNCIL**

Claimants

and

PERSONS UNKNOWN

Defendants

COMMUNICATIONS PLAN: APPENDIX NINE

Councils and police seek street racing an in court next week

Released: TBC



The four Black Country councils and West Midlands Police will appear before the High Court next week to apply for a new injunction to ban "street racing" across the region.

If successful, the injunction will prohibit people from participating in, attending, promoting, organising or publicising a street racing event, also known as car cruising, anywhere within the boroughs of Wolverhampton, Dudley, Sandwell or Walsall.

Anyone ignoring the injunction could be arrested, face penalties such as up to two years' imprisonment or an unlimited fine, or have their assets seized.

For the purposes of the application, street racing is defined as the act of drivers of cars, motorbikes or quadbikes meeting to race or show off in their vehicles.

A similar injunction had previously been in force in the Black Country between 2015 and 2021, and had helped dramatically reduce instances of street racing across the region in that time.

The new application is once again being led by the City of Wolverhampton Council on behalf of the four Black Country councils and West Midlands Police.

Councillor Jasbir Jaspal, the City of Wolverhampton Council's Cabinet Member for Public Health and Wellbeing, said: "We are pleased to be returning to the High Court on (DATE) to seek a new injunction against street racing in the Black Country.

“Street racing, also sometimes described as car cruising, is noisy, dangerous and illegal and some events have resulted in serious injuries and even death.

"The previous Black Country-wide injunction proved incredibly effective in reducing instances of street racing across the region. However, the problem still persists in some areas, and has started to grow again since the original injunction expired.

“Since announcing our intention to seek a new injunction, we have been inundated with comments from residents and businesses whose lives are still being blighted by street racing, with evidence of dangerous driving, excessive noise, littering and people and vehicles obstructing highways and properties. These have helped us build what we believe to be an overwhelming case for the injunction.

"It is important that the authorities have the powers they need to crack down on street racing as and when it occurs and so we are naturally hopeful that we can secure this new injunction as soon as possible."

The application will be heard at Birmingham High Court on (DATE). For more information, including details of full terms of the proposed injunction and evidence in support of the application, please visit www.wolverhampton.gov.uk/street-racing-injunction

People are invited to submit comments and observations regarding street racing and the application for a new injunction by emailing litigation@wolverhampton.gov.uk.

Incidents of street racing should be reported via asbu@wolverhamptonhomes.org.uk or to West Midlands Police on 101. In an emergency, always dial 999.

ENDS

Notes to editors:

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(3) SANDWELL METROPOLITAN BOROUGH COUNCIL
(4) WALSALL METROPOLITAN BOROUGH COUNCIL**

Claimants

and

PERSONS UNKNOWN

Defendants

COMMUNICATIONS PLAN: APPENDIX TEN



Social media to accompany media release a week before High Court hearing

TWITTER

We, together with @dudleymbc, @sandwellcouncil, @WalsallCouncil & @WMPolice are applying for new High Court injunction to ban "street racing" in the Black Country next week. Full story: XXXX (1/3)

If successful, the injunction will prohibit people from participating in, attending, promoting, organising or publicising a street racing event (AKA car cruising), anywhere within the boroughs of Wolverhampton, Dudley, Sandwell or Walsall. (2/3)

The application will be heard at Birmingham High Court on (DATE). For more information, including details of full terms of the proposed injunction and evidence in support of the application, please visit www.wolverhampton.gov.uk/street-racing-injunction. (3/3)

FACEBOOK

The four Black Country councils and West Midlands Police will be at the High Court next week to seek an injunction to ban "street racing" in the region.

If successful, the injunction will prohibit people from participating in, attending, promoting, organising or publicising a street racing event (also known as car cruising), anywhere within the boroughs of Wolverhampton, Dudley, Sandwell or Walsall.

Councillor Jasbir Jaspal, Cabinet Member for Public Health and Wellbeing, said: "Street racing, also sometimes described as car cruising, is noisy, dangerous and illegal and some events have resulted in serious injuries and even death.

"A previous Black Country-wide injunction proved incredibly effective in reducing instances of street racing across the region. However, the problem still persists in some areas, and has started to grow again since the original injunction expired and so we are naturally hopeful that we can secure this new injunction as soon as possible."

The application will be heard at Birmingham High Court on (DATE). For more information, including details of full terms of the proposed injunction and evidence in support of the application, please visit www.wolverhampton.gov.uk/street-racing-injunction. Read more here: (LINK TO NEWS STORY)

INSTAGRAM

The four Black Country councils and West Midlands Police will be at the High Court next week to seek an injunction to ban "street racing" in the region.

If successful, the injunction will prohibit people from participating in, attending, promoting, organising or publicising a street racing event (also known as car cruising), anywhere within the boroughs of Wolverhampton, Dudley, Sandwell or Walsall.

The application will be heard at Birmingham High Court on (DATE). For more information, including details of full terms of the proposed injunction and evidence in support of the application, please visit www.wolverhampton.gov.uk/street-racing-injunction. Read more here: (LINK TO NEWS STORY)

DRAFT

**IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION**

CLAIM NO:

B E T W E E N:

**(1) WOLVERHAMPTON CITY COUNCIL
(2) DUDLEY METROPOLITAN BOROUGH COUNCIL
(3) SANDWELL METROPOLITAN BOROUGH COUNCIL
(4) WALSALL METROPOLITAN BOROUGH COUNCIL**

Claimants

and

PERSONS UNKNOWN

Defendants

COMMUNICATIONS PLAN: APPENDIX ELEVEN

Street racing banned in Black Country by High Court

Released: TBC



The High Court has today (DATE) granted an injunction banning “street racing” across the Black Country.

The injunction prohibits people from participating in, attending, promoting, organising or publicising a street racing event, also known as car cruising, anywhere within the boroughs of Wolverhampton, Dudley, Sandwell or Walsall.

Anyone ignoring the injunction could be arrested or face penalties such as up to two years' imprisonment, an unlimited fine or have their assets seized.

For the purposes of the application, street racing is defined as the act of drivers of cars, motorbikes or quadbikes meeting to race or show off in their vehicles. The injunction will come into effect on (DATE) and is valid for a period of three years.

Granting the injunction, which is served against ‘persons unknown’, His Honour XXX, sitting as a High Court Judge, said: “XXXXXXXXXX”

The application was led by the City of Wolverhampton Council on behalf of Dudley Council, Sandwell Council, Walsall Council and West Midlands Police.

Councillor Jasbir Jaspal, the City of Wolverhampton Council's Cabinet Member for Public Health and Wellbeing, said: "We are delighted that the High Court has granted this injunction, which will help tackle the menace of street racing in the Black Country.

“A similar injunction was in force between 2015 and 2021 which helped dramatically reduce instances of street racing across the region – and we are very confident this new injunction will have the same positive effect.

“Street racing, also sometimes described as car cruising, is noisy, dangerous and illegal and some events have resulted in serious injuries and even death.

"After announcing our intention to seek a new injunction earlier this summer, we were inundated with comments from residents and businesses whose lives are still being blighted by street racing, with evidence of dangerous driving, excessive noise, littering and people and vehicles obstructing highways and properties.

“These helped us build what the High Court has recognised to be an overwhelming case for this injunction, which will give the authorities the powers they need to crack down on street racing as and when it occurs.”

QUOTE FROM WEST MIDLANDS POLICE

For more information, including details of full terms of the injunction and evidence in support of the application, please visit www.wolverhampton.gov.uk/street-racing-injunction.

Incidents of street racing should be reported via asbu@wolverhamptonhomes.org.uk or to West Midlands Police on 101. In an emergency, always dial 999.

ENDS

Notes to editors:

1/ For more information or to arrange an interview, please contact Paul Brown, Communications Manager, on 01902 555497 or email paul.brown@wolverhampton.gov.uk.

- **Issued by the City of Wolverhampton Council’s Corporate Communications Team.**
- **For more information, please call 01902 555439.**
- **More news from the City of Wolverhampton Council is available at:**
 - www.wolverhampton.gov.uk/news
 - www.twitter.com/wolvescouncil
 - www.facebook.com/wolverhamptontoday
 - www.youtube.com/wolverhamptontoday

**IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION**

CLAIM NO:

B E T W E E N:

**(1) WOLVERHAMPTON CITY COUNCIL
(2) DUDLEY METROPOLITAN BOROUGH COUNCIL
(3) SANDWELL METROPOLITAN BOROUGH COUNCIL
(4) WALSALL METROPOLITAN BOROUGH COUNCIL**

Claimants

and

PERSONS UNKNOWN

Defendants

COMMUNICATIONS PLAN: APPENDIX TWELVE



Social media to accompany media release upon granting of injunction

Twitter

The High Court has today (DATE) granted an injunction banning “street racing”, also known as car cruising, across the Black Country. Full story: [LINK TO MEDIA RELEASE](#)

It will prohibit people from participating in, attending, promoting, organising or publicising a street racing event (AKA car cruising) anywhere within the @WolvesCouncil, @dudleymbc, @sandwellcouncil, @WalsallCouncil areas. (2/4) @WMPolice

Anyone ignoring the injunction could be arrested or face penalties such as up to two years' imprisonment, an unlimited fine or have their assets seized. It comes into effect on DATE. (3/4)

For more information, including details of full terms of the injunction and evidence in support of the application, please visit www.wolverhampton.gov.uk/street-racing-injunction. (4/4)

FACEBOOK

The High Court has today granted an injunction banning “street racing”, also known as car cruising, across the Black Country.

It will prohibit people from participating in, attending, promoting, organising or publicising a street racing event (also sometimes called car cruising) anywhere within Wolverhampton, Dudley, Sandwell or Walsall.

Anyone ignoring the injunction could be arrested or face penalties such as up to two years' imprisonment, an unlimited fine or have their assets seized. It comes into effect on DATE.

The application was brought by the City of Wolverhampton Council on behalf of the four Black Country councils and West Midlands Police. Councillor Jasbir Jaspal, Cabinet Member for Public Health and Wellbeing, said: "We are delighted that the High Court has granted this injunction, which will help tackle the scourge of street racing in the Black Country.

"We have been inundated with comments from residents and businesses whose lives are being blighted by street racing, and these helped us build an overwhelming case for this injunction which will give the authorities the powers they need to crack down on street racing as and when it occurs."

Please click [LINK TO MEDIA RELEASE](#) to read the full story. For more information, including details of full terms of the injunction and evidence in support of the application, please visit www.wolverhampton.gov.uk/street-racing-injunction.

INSTAGRAM

"Street racing", also known as "car cruising", will be banned across the Black Country after the High Court granted a new injunction.

It will prohibit people from participating in, attending, promoting, organising or publicising a street racing event anywhere within Wolverhampton, Dudley, Sandwell or Walsall. Anyone ignoring the injunction could be arrested or face penalties such as up to two years' imprisonment, an unlimited fine or have their assets seized. It comes into effect on DATE.

Please click [LINK TO MEDIA RELEASE](#) to read the full story. For more information, including details of full terms of the injunction and evidence in support of the application, click www.wolverhampton.gov.uk/street-racing-injunction.

**IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION**

CLAIM NO:

B E T W E E N:

**(1) WOLVERHAMPTON CITY COUNCIL
(2) DUDLEY METROPOLITAN BOROUGH COUNCIL
(3) SANDWELL METROPOLITAN BOROUGH COUNCIL
(4) WALSALL METROPOLITAN BOROUGH COUNCIL**

Claimants

and

PERSONS UNKNOWN

Defendants

COMMUNICATIONS PLAN: APPENDIX THIRTEEN

STREET RACING BANNED IN THE BLACK COUNTRY

**Street racing injunction
now in force across
Dudley, Sandwell,
Walsall and
Wolverhampton.**

www.wolverhampton.gov.uk/street-racing-injunction



Walsall Council

CITY OF
WOLVERHAMPTON
COUNCIL

Street racing, also known as '**car cruising**', is banned across the Black Country by a High Court injunction which came into effect on: XXXXXXXXXXXX

The injunction forbids people from participating in or promoting, organising or publicising a 'street racing' event anywhere within the Black Country. Anyone suspected of breaching it will be at risk of being in contempt of court, for which an adult can face up to two years in prison and a fine.

*Anyone who witnesses a street racing event on the public highway or publicly accessible place is asked to call the **West Midlands Police on 101** or email asbu@wolverhamptonhomes.org.uk. **In an emergency, dial 999.***

INJUNCTION - *The injunction states:*

IT IS FORBIDDEN to participate between the hours of 3pm and 7am in a gathering of two or more persons within the Black Country Area at which some of those present engage in motor racing or motor stunts or other dangerous or obstructive driving.

IT IS FORBIDDEN to participate between the hours of 3pm and 7am in a gathering of two or more persons within the Black Country Area with the intention or expectation that some of those present will engage in motor racing or motor stunts or other dangerous or obstructive driving.

IT IS FORBIDDEN to promote, organise or publicise (by any means whatsoever) any gathering between the hours of 3pm and 7am of two or more persons with the intention or expectation that some of those present will engage in motor racing or motor stunts or other dangerous or obstructive driving within the Black Country Area.

Stunts are driving manoeuvres often undertaken at such gatherings including:

- a) **“Burnouts”**, causing a vehicle to destroy its tyres by applying power to the drive wheels while braking so as to remain in place while the wheels revolve at speed;
- b) **“Donuts/Donutting”**, causing a vehicle to rotate around a fixed point (normally the front axle) while not moving-off causing noise, smoke and tyre marks to be created;
- c) **“Drifting”**, turning by placing the vehicle in a skid so that most sideways motion is due to the skid not any significant steering input; and
- d) **“Undertaking”**, passing a vehicle on its nearside so as to overtake in circumstances not permitted by the Highway Code.

A power of arrest applies to the injunction. The injunction and power of arrest came into effect on XXXXXXXXXXXX and is valid for three years.

*The full injunction and map showing the defined **Black Country Area** is available at www.wolverhampton.gov.uk/street-racing-injunction and at council offices.*

**IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION**

CLAIM NO:

B E T W E E N:

**(1) WOLVERHAMPTON CITY COUNCIL
(2) DUDLEY METROPOLITAN BOROUGH COUNCIL
(3) SANDWELL METROPOLITAN BOROUGH COUNCIL
(4) WALSALL METROPOLITAN BOROUGH COUNCIL**

Claimants

and

PERSONS UNKNOWN

Defendants

COMMUNICATIONS PLAN: APPENDIX FOURTEEN

Street racing ban comes into force in Black Country

Released: TBC



“Street racing” has been officially banned in the Black Country after a High Court injunction came into force today (DATE).

The injunction prohibits people from participating in, attending, promoting, organising or publicising a street racing event, also known as car cruising, anywhere within the boroughs of Wolverhampton, Dudley, Sandwell or Walsall.

Anyone ignoring the injunction could be arrested or face penalties such as up to two years' imprisonment, an unlimited fine or have their assets seized.

For the purposes of the application, street racing is defined as the act of drivers of cars, motorbikes or quadbikes meeting to race or show off in their vehicles. It is also sometimes known as car cruising.

The application for the injunction was led by the City of Wolverhampton Council on behalf of Dudley Council, Sandwell Council, Walsall Council and West Midlands Police.

Councillor Jasbir Jaspal, the City of Wolverhampton Council's Cabinet Member for Public Health and Wellbeing, said: "We are delighted that this injunction is now in force, and are confident it will have an immediate effect in helping to tackle what is becoming a growing problem in the Black Country.

“A similar injunction was in force between 2015 and 2021, and helped dramatically reduce instances of street racing across the region. Since it expired, more and more cases have been reported to the authorities, and this injunction gives local councils and the police the tools they need to deal with the perpetrators.”

She added: “Street racing, also sometimes described as car cruising, is noisy,

dangerous and illegal and some events have resulted in serious injuries and even death.

“The injunction makes it very clear that anyone participating in a street race, whether as a participant, spectator, organiser or promoter, will be in contempt of court and will face very severe penalties.”

Incidents of street racing should be reported via asbu@wolverhamptonhomes.org.uk or to West Midlands Police on 101. In an emergency, always dial 999.

For more information about the injunction, which is in place for XXX years, please visit www.wolverhampton.gov.uk/street-racing-injunction

Incidents of street racing should be reported via asbu@wolverhamptonhomes.org.uk or to West Midlands Police on 101. In an emergency, always dial 999.

ENDS

Notes to editors:

1/ For more information or to arrange an interview, please contact Paul Brown, Communications Manager, on 01902 555497 or email paul.brown@wolverhampton.gov.uk.

- **Issued by the City of Wolverhampton Council’s Corporate Communications Team.**
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 - www.youtube.com/wolverhamptontoday

**IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION**

CLAIM NO:

B E T W E E N:

**(1) WOLVERHAMPTON CITY COUNCIL
(2) DUDLEY METROPOLITAN BOROUGH COUNCIL
(3) SANDWELL METROPOLITAN BOROUGH COUNCIL
(4) WALSALL METROPOLITAN BOROUGH COUNCIL**

Claimants

and

PERSONS UNKNOWN

Defendants

COMMUNICATIONS PLAN: APPENDIX FIFTEEN



Social media to accompany media release issued at time injunction comes into force

"Street racing", also sometimes called "car cruising" is now officially banned in the Black Country after a High Court injunction came into force today (DATE). Full story: [LINK TO MEDIA RELEASE](#) (1/4)

The injunction, secured with support from @WMPolice, prohibits people from participating in, attending, promoting, organising or publicising a street racing event anywhere within the @WolvesCouncil, @dudleymbc, @sandwellcouncil, @WalsallCouncil areas. (2/4)

Anyone ignoring the injunction could be arrested or face penalties such as up to two years' imprisonment, an unlimited fine or have their assets seized. (3/4)

For more information about the injunction, which is in place for XXX years, please visit www.wolverhampton.gov.uk/street-racing-injunction. (4/4)

FACEBOOK

"Street racing", also known as car cruising, is now officially banned in the Black Country after a High Court injunction came into force today (DATE).

The injunction prohibits people from participating in, attending, promoting, organising or publicising a street racing event anywhere within Wolverhampton, Dudley, Sandwell or Walsall.

Anyone ignoring the injunction could be arrested or face penalties such as up to two years' imprisonment, an unlimited fine or have their assets seized.

The application was brought by the City of Wolverhampton Council on behalf of the four Black Country councils and West Midlands Police. Councillor Jasbir Jaspal, Cabinet Member for Public Health and Wellbeing, said: "We are delighted that this injunction is now in force, and are confident it will have an immediate effect in helping to tackle what is becoming a growing problem in the Black Country.

"Street racing is noisy, dangerous and illegal and some events have resulted in serious injuries and even death. The injunction makes it very clear that anyone participating in a street race, whether as a participant, spectator, organiser or promoter, will be in contempt of court and will face very severe penalties."

Please click [LINK TO MEDIA RELEASE](#) to read the full story. For more information about the injunction, which is in place for XXX years, please visit www.wolverhampton.gov.uk/street-racing-injunction.

INSTAGRAM

"Street racing", also known as "car cruising", is now officially banned across the Black Country after a new High Court injunction came into force today (DATE).

It prohibits people from participating in, attending, promoting, organising or publicising a street racing event anywhere within Wolverhampton, Dudley, Sandwell or Walsall. Anyone ignoring the injunction could be arrested or face penalties such as up to two years' imprisonment, an unlimited fine or have their assets seized.

Please click [LINK TO MEDIA RELEASE](#) to read the full story. For more information about the injunction, which is in place for XXX years, please visit www.wolverhampton.gov.uk/street-racing-injunction

**IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION**

CLAIM NO:

B E T W E E N:

**(1) WOLVERHAMPTON CITY COUNCIL
(2) DUDLEY METROPOLITAN BOROUGH COUNCIL
(3) SANDWELL METROPOLITAN BOROUGH COUNCIL
(4) WALSALL METROPOLITAN BOROUGH COUNCIL**

Claimants

and

PERSONS UNKNOWN

Defendants

COMMUNICATIONS PLAN: APPENDIX – “DIGITAL SIGNAGE”

Digital signage information for Wolverhampton and Walsall, please see below.

A note regarding signs highlighted blue. These are not currently able to display picture messages but are able to display free text messages.

Wolverhampton Car Park Guidance and Traffic Information	CPG0 1	Waterloo Road - Inbound / Nr Whitmore Hill - Wolverhampton	VMS - Freetex t RGB
	CPG0 2	Ring Road St Peters / From Stafford St to Waterloo Rd - Wolverhampton	VMS - Freetex t RGB
	CPG0 3	Ring Rd St Andrews / From Waterloo Rd to Chapel Ash - Wolverhampton	VMS - Freetex t RGB
	CPG0 4	Chapel Ash Inbound / Nr to Chapel Ash Island - Wolverhampton	VMS - Freetex t RGB
	CPG0 5	Ring Rd St Marks / From Penn Island to Chapel Ash - Wolverhampton	VMS - Freetex t RGB
	CPG0 6	Ring Rd St Andrews / Nr to Bath Road - Wolverhampton	VMS - Freetex t RGB
	CPG0 7	Ring Road St Johns / Penn Road Island - Wolverhampton	VMS - Freetex t RGB
	CPG0 8	Stafford Road Inbound / Between Cannock Rd and Ring Rd - Wolverhampton	VMS - Freetex t RGB
	CPG0 9	Penn Road Inbound / Nr Mercedes Benz - Wolverhampton	VMS - Freetex t RGB
	CPG1 0	Dudley Rd I/B Nr Bell Place	VMS - Freetex t RGB
	CPG1 1	Ring Rd / St Georges	VMS - Freetex t RGB
	CPG1 2	Ring Rd / St Marks	VMS - Freetex t RGB
	CPG1 3	Ring Rd - St Johns to Snowhill Jct	VMS - Freetex t RGB
	CPG1 4	Ring Rd - St Patricks to Stafford St Jct	VMS - Freetex t RGB

	CPG1 5	Ring Rd - Stafford St to Broad St	VMS - Freetex t RGB
	CPG1 6	Ring Rd - Broad St to Bilston St Island	VMS - Freetex t RGB
	CPG1 7	Ring Rd - Bilston St Island to Broad St	VMS - Freetex t RGB
	CPG1 8	Ring Rd - Snowhill Jct to Bilston St Island	VMS - Freetex t RGB
Walsall Traffic Information Signs	WA01	Wolverhampton Road / Primley Avenue	VMS - Freetex t RGB
	WA02	Bescot Road / Bescot Drive	VMS - Freetex t RGB
	WA03	Lichfield Road / Cartbridge Lane	VMS - 4x15 Freetex t
	WA04	Birmingham Road / Nr Charlemont Road	VMS - Freetex t RGB
	WA05	Darlaston Road / Nr Cemetery Road	VMS - 4x15 Freetex t
	WA06	Green Lane /Nr Beatrice Street	VMS - 4x15 Freetex t
	WA07	Pleck Rd / Wolve Rd - Walsall	VMS - Freetex t RGB
	WA08	Bloxwich Lane - Walsall	VMS - Freetex t RGB
	WA09	BCNR / Nr Wiggle - Bilston	VMS - Freetex t RGB
	WA10	BCR / Nr Bilston FC	VMS - Freetex t RGB
	WA11	Willenhall Rd O/B	VMS - Freetex t RGB

	WA12	A4148 - Broadway North	VMS - Freetex t RGB
	WA13	B4151 - Sutton Rd	VMS - Freetex t RGB
	WA14	A4031-Walsall Rd Nr Greenside Way	VMS - Freetex t RGB
	WA15	B4210-Stafford St Nr Proffit St & Hospital St	VMS - Freetex t RGB
Wolverhampton Traffic Information Signs	WO01	Bilston Road / Nr Steelhouse Lane	VMS - Freetex t RGB
	WO02	Wellington Road / Nr Wolverhampton Street	VMS - Freetex t RGB
	WO03	Stafford Road / The Maltings	VMS - 3x15 Freetex t
	WO04	Wednesfield Road / Nr Bowmans Harbour	VMS - Freetex t RGB
	WO05	Oxford Street / Nr Hare Street - Bilston	VMS - Freetex t RGB
	WO06	Horseley Fields / Nr St James Street I/B	VMS - Freetex t RGB
	WO08	Penn Road / Nr Lea Road I/B	VMS - 3x15 Freetex t
	WO09	Birmingham New Road / Nr Shaw Road I/B	VMS - Freetex t RGB
	WO10	Lichfield Road / Nr Lyndale	VMS - Freetex t RGB
	WO11	Wednesfield Road / Nr Lincoln Road I/B	VMS - Freetex t RGB
	WO12	Cannock Road / Old Hampton Road	VMS - Freetex t RGB

WO13	Willenhall Road / Nr Vaughn Road I/B	VMS - Freetex t RGB
WO14	Stafford Road / Nr Farmbrook I/B	VMS - Freetex t RGB
WO15	Compton Road / Compton Village	VMS - 3x15 Freetex t
WO16	Wolverhampton Road East / Nr Dudding Road I/B	VMS - Freetex t RGB
WO17	Bilston Road / / Nr Steelhouse Lane O/B	VMS - 3x15 Freetex t
WO18	Black Country Route / Nr The Lunt	VMS - Freetex t RGB
WO19	Penn Road / Nr Lea Road O/B	VMS - Freetex t RGB
WO20	Birmingham Road / Nr Lever Street O/B	VMS - Freetex t RGB
WO21	Stafford Road / Nr Goodyear Island I/B	VMS - Freetex t RGB
WO22	Stafford Street / Nr Nursery Street O/B	VMS - Freetex t RGB
WO23	Wednesfield Road / Nr Lincoln Street I/B	VMS - 3x15 Freetex t
WO24	Wergs Road	VMS - 4x15 Freetex t
WO25	Coseley Road / BCR Link	VMS - Freetex t RGB
WO26	Stourbridge Road. Penn	VMS - 4x15 Freetex t

WO27	Willenhall Road / Lower Horseley Fields O/B	VMS - Freetex t RGB
WO28	Stafford Road / Nr Gorsebrook Road	VMS - 4x15 Freetex t
WO29	Wobaston Road /Nr Patshul Avenue	VMS - 4x15 Freetex t
WO30	Ring Road St Peters (A0141)	VMS - Freetex t RGB
WO32	Ring Road St Andrews (A0141)	VMS - 4x15 Freetex t
WO33	Ring Road St Davids (A0117)	VMS - 4x15 Freetex t
WO34	BNR / Nr BCR	VMS - Freetex t RGB
WO35	Dudley st / Nr the Splitter	VMS - Freetex t RGB
WO36	Stafford Rd / Nr Oxley moor	VMS - Freetex t RGB

**IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION**

CLAIM NO:

B E T W E E N:

**(1) WOLVERHAMPTON CITY COUNCIL
(2) DUDLEY METROPOLITAN BOROUGH COUNCIL
(3) SANDWELL METROPOLITAN BOROUGH COUNCIL
(4) WALSALL METROPOLITAN BOROUGH COUNCIL**

Claimants

and

PERSONS UNKNOWN

Defendants

COMMUNICATIONS PLAN – APPENDIX: “SIGNAGE ONE”

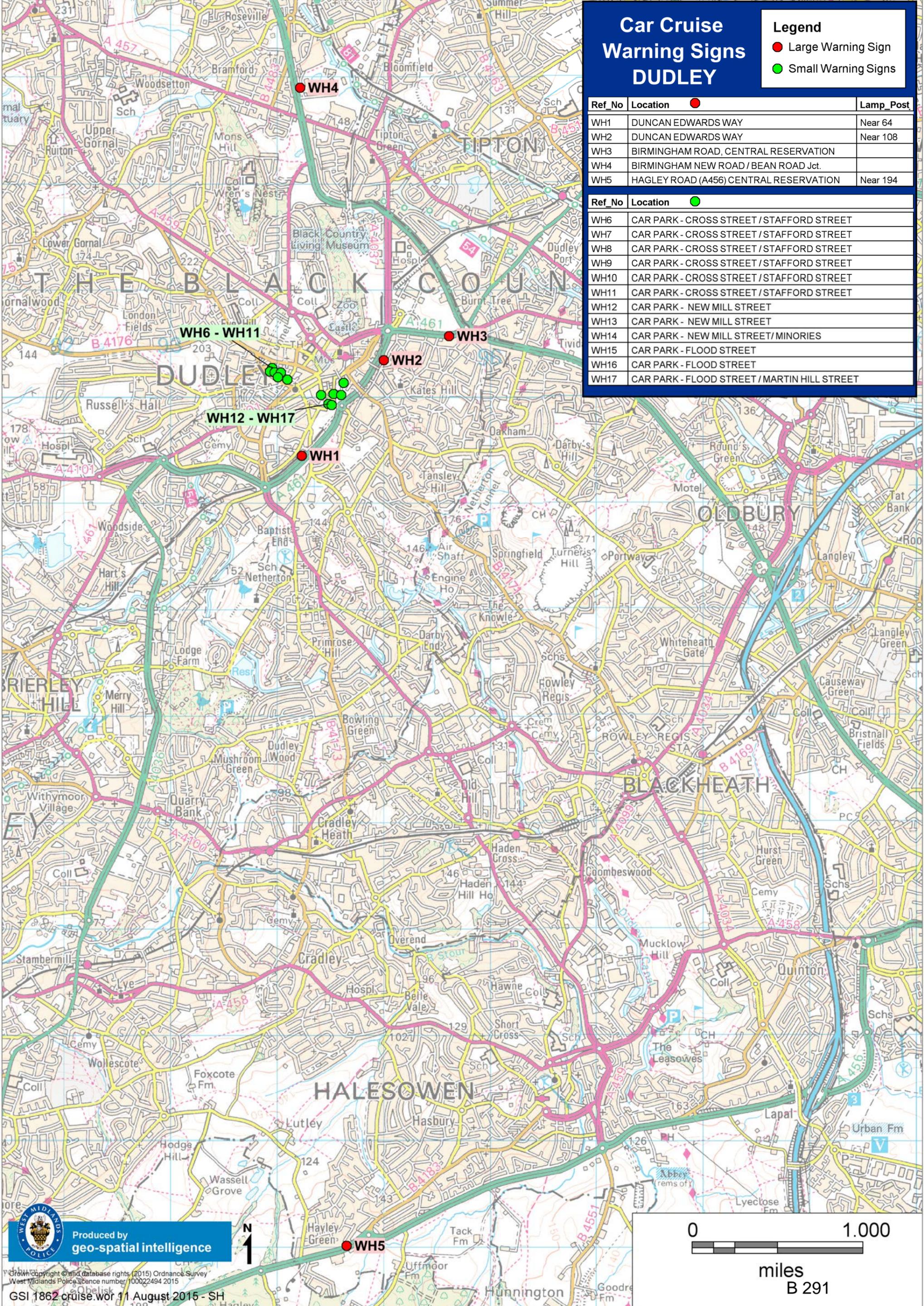
Car Cruise Warning Signs DUDLEY

Legend

- Large Warning Sign
- Small Warning Signs

Ref_No	Location	Lamp_Post
WH1	DUNCAN EDWARDS WAY	Near 64
WH2	DUNCAN EDWARDS WAY	Near 108
WH3	BIRMINGHAM ROAD, CENTRAL RESERVATION	
WH4	BIRMINGHAM NEW ROAD / BEAN ROAD Jct.	
WH5	HAGLEY ROAD (A456) CENTRAL RESERVATION	Near 194

Ref_No	Location
WH6	CAR PARK - CROSS STREET / STAFFORD STREET
WH7	CAR PARK - CROSS STREET / STAFFORD STREET
WH8	CAR PARK - CROSS STREET / STAFFORD STREET
WH9	CAR PARK - CROSS STREET / STAFFORD STREET
WH10	CAR PARK - CROSS STREET / STAFFORD STREET
WH11	CAR PARK - CROSS STREET / STAFFORD STREET
WH12	CAR PARK - NEW MILL STREET
WH13	CAR PARK - NEW MILL STREET
WH14	CAR PARK - NEW MILL STREET/MINORIES
WH15	CAR PARK - FLOOD STREET
WH16	CAR PARK - FLOOD STREET
WH17	CAR PARK - FLOOD STREET / MARTIN HILL STREET




Produced by
geo-spatial intelligence



**IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION**

CLAIM NO:

B E T W E E N:

**(1) WOLVERHAMPTON CITY COUNCIL
(2) DUDLEY METROPOLITAN BOROUGH COUNCIL
(3) SANDWELL METROPOLITAN BOROUGH COUNCIL
(4) WALSALL METROPOLITAN BOROUGH COUNCIL**

Claimants

and

PERSONS UNKNOWN

Defendants

COMMUNICATIONS PLAN – APPENDIX: “SIGNAGE TWO”

**IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION**

CLAIM NO:

B E T W E E N:

**(1) WOLVERHAMPTON CITY COUNCIL
(2) DUDLEY METROPOLITAN BOROUGH COUNCIL
(3) SANDWELL METROPOLITAN BOROUGH COUNCIL
(4) WALSALL METROPOLITAN BOROUGH COUNCIL**

Claimants

and

PERSONS UNKNOWN

Respondents

**SCHEDULE OF LOCATIONS OF ROAD SIGNS IN THE LOCAL GOVERNMENT AREA OF
WOLVERHAMPTON CITY COUNCIL PUBLICISING A HIGH COURT INJUNCTION
PROHIBITING CAR CRUISING/STREET RACING**

EXISTING SIGNAGE (INSTALLED BETWEEN JANUARY 2015 and JANUARY 2021)

No	Location of Sign	Material of Sign (Metal or Foamex)
1.	Duncan Edwards Way (Lamppost 64)	Metal
2.	Duncan Edwards Way (Lamppost 108)	Metal
3.	Birmingham New Road Central Reservation (point WH3 on map "Car Cruise Warning Signs, Dudley")	Metal
4.	Birmingham New Road/Bean Road Junction (point WH4 on map "Car Cruise Warning Signs, Dudley")	Metal
5.	Hagley Road, A456 Junction Central Reservation (near 194) (point WH5 on map "Car Cruise Warning Signs, Dudley")	Metal
6.	Car Park Cross Street/Stafford Street (6 no.) (Points WH6 – WH11 on map "Car Cruise Warning Signs, Dudley")	Foamex
7.	Car Park New Mill Street/Minories (3 no.) (Points WH12 – WH14 on map "Car Cruise Warning Signs, Dudley")	Foamex

1.	Flood Street Car Park (3 no.) (Points WH15 – WH17 on map “Car Cruise Warning Signs, Dudley”)	Foamex
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**IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION**

CLAIM NO:

B E T W E E N:

**(5) WOLVERHAMPTON CITY COUNCIL
(6) DUDLEY METROPOLITAN BOROUGH COUNCIL
(7) SANDWELL METROPOLITAN BOROUGH COUNCIL
(8) WALSALL METROPOLITAN BOROUGH COUNCIL**

Claimants

and

PERSONS UNKNOWN

Respondents

**SCHEDULE OF LOCATIONS OF ROAD SIGNS IN THE LOCAL GOVERNMENT AREA OF
WOLVERHAMPTON CITY COUNCIL PUBLICISING A HIGH COURT INJUNCTION
PROHIBITING CAR CRUISING/STREET RACING**

**PROPOSED SIGNAGE (TO BE INSTALLED IF APPLICATION FOR INJUNCTION AUTUMN
2022 IS SUCCESSFUL AND THE HONOURABLE COURT GRANTS AN INJUNCTION)**

No	Location of Sign	Material of Sign (Metal or Foamex)
1.	Hagley Road (2 no.)	Metal Signs
2.	Waterfront (4 no.) signs at entrances to Waterfront	Metal Signs
3.	Merry Hill Retail Centre (30 no.)	Foamex Signs around centre

4.	Black Country Route between Roundabout with exit for Armstrong Way Keyway Retail Park and Premier Inn, Walsall (both directions) 15 no. signs at regular intervals in each direction (30 no. signs in total) and metal signs at end point of parallel lines in each direction (2 no. metal signs) (Marked as area between two bold red parallel lines on map "Proposed Signage (Wolverhampton) (Map 2 of 3)	30 Foamex Signs 2 Metal Signs
5.	Black Country Route between Premier Inn, Walsall, M6 Junction 10 and Roundabout at Junction 10 of the M6 by Boundary Outlet, Walsall at regular intervals in both directions (15 no. foam signs in each direction, 30 no. foam signs in total) and metal signs at end point of parallel lines in each direction (2 no. metal signs). (Marked as area between two bold red parallel lines on map "Proposed Signage (Wolverhampton) (Map 3 of 3)	2 metal signs 30 Foamex signs